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Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: WT Docket No. 10-153, Amendment of Part 101 to Facilitate Wireless Backhaul

Dear Ms. Dortch:

On behalf of the Fixed Wireless Communications Coalition (FWCC),¹ pursuant to Section 1.1206(b)(2) of the Commission's Rules, I am electronically filing this written *ex parte* communication in the above-referenced docket.

I am writing to draw the Commission's attention to certain apparent clerical errors in the order released on August 3 in the above-referenced proceeding—specifically in Appendix A, "Final Rules,"

¹ The FWCC is a coalition of companies, associations, and individuals interested in the Fixed Service—i.e., in terrestrial fixed microwave communications. Our membership includes manufacturers of microwave equipment, fixed microwave engineering firms, licensees of terrestrial fixed microwave systems and their associations, and communications service providers and their associations. The membership also includes railroads, public utilities, petroleum and pipeline entities, public safety agencies, cable TV providers, backhaul providers, and/or their respective associations, communications carriers, and telecommunications attorneys and engineers. Our members build, install, and use both licensed and unlicensed point-to-point, point-to-multipoint, and other fixed wireless systems, in frequency bands from 900 MHz to 95 GHz. For more information, see www.fwcc.us.

Marlene H. Dortch, Secretary
August 23, 2012
Page 2

Section 101.147, Frequency Assignments.² The Commission there specifies newly authorized 60 MHz bandwidth channels in the 5,925-6,425 MHz band, and 80 MHz bandwidth channels in the 10,700-11,700 MHz band.

The FWCC had understood the Commission intended to “combine adjacent channels in [these bands] to form 60 and 80 megahertz wide channels”³ The channels specified in the new Section 101.147 entries, however, are not combinations of existing adjacent channels, but rather are offset from existing channels upward by 4.945 MHz in the 6 GHz band, and downward by 10 MHz in the 11 GHz band.

These offsets are detrimental to efficient spectrum use. As the rule presently stands, coordinating a single 60 MHz channel will impinge on three 30 MHz channels, rather than two; and similarly, coordinating a single 80 MHz channel will impinge on three 40 MHz channels, rather than two.

We respectfully suggest that the tables in the newly adopted provisions of Section 101.147 should read as follows:

- (i) 5,925 to 6,425 MHz 60 MHz authorized bandwidth

* * * * *

(9) 60 MHz bandwidth channels*

Transmit (receive) (MHz)	Receive (transmit) (MHz)
5960.025	6212.065
6019.325	6271.365
6078.625	6330.665
6137.925	6389.965

* The highest available channel should be selected, except where such a choice would impede the efficiency of local frequency coordination efforts.

* * * * *

² *Amendment of Part 101 of the Commission’s Rules to Facilitate the Use of Microwave for Wireless Backhaul*, WT Docket No. 10-153, Second Report and Order, Second Further Notice of Proposed Rulemaking, Second Notice of Inquiry, Order on Reconsideration, and Memorandum Opinion and Order, FCC 12-87 at 50-51 (released Aug. 3, 2012).

³ *Id.* at ¶ 47.

Marlene H. Dortch, Secretary
August 23, 2012
Page 3

(o) 10,700 to 11,700 MHz 80 MHz authorized bandwidth

* * * * *

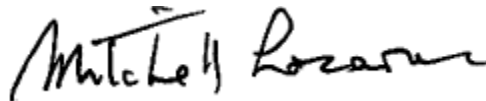
(8) 80 MHz bandwidth channels*

Transmit (receive) (MHz)	Receive (transmit) (MHz)
10755	11245
10835	11325
10915	11405
10995	11485
11075	11565
11155	11645

* The highest available channel should be selected, except where such a choice would impede the efficiency of local frequency coordination efforts.

We hope this information is helpful. Please do not hesitate to contact me with any questions.

Respectfully submitted,



Mitchell Lazarus
Counsel for the Fixed Wireless
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