

Before the  
**Federal Communications Commission**  
Washington DC 20554

In the Matter of	)	
	)	
Amendment of Part 101 of the Commission's	)	
Rules to Facilitate the Use of Microwave for	)	
Wireless Backhaul and Other Uses and to	)	WT Docket No. 10-153
Provide Additional Flexibility to Broadcast	)	
Auxiliary Service and Operational Fixed	)	
Microwave Licensees	)	
	)	
Petition for Rulemaking filed by Fixed	)	
Wireless Communications Coalition to	)	
Amend Part 101 of the Commission's Rules to	)	RM-11602
Authorize 60 and 80 MHz Channels in	)	
Certain Bands for Broadband	)	
Communications	)	

**PETITION FOR RECONSIDERATION**

Pursuant to Section 1.429 of the Commission's Rules, the Fixed Wireless Communications Coalition (FWCC)<sup>1</sup> seeks reconsideration of one element of the Second Report and Order in the above-referenced proceeding.<sup>2</sup>

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<sup>1</sup> 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](http://www.fwcc.us).

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

The FWCC requests correction of certain apparent clerical errors in the Second Report and Order released August 3, 2012, specifically with regard to Appendix A, “Final Rules,” Section 101.147, Frequency Assignments.<sup>3</sup> 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 . . . .”<sup>4</sup> 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.

The FWCC respectfully suggests 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\*

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<sup>3</sup> *Id.* at 50-51.

<sup>4</sup> *Id.* at ¶ 47.

<b>Transmit (receive) (MHz)</b>	<b>Receive (transmit) (MHz)</b>
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.

\* \* \* \* \*

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

\* \* \* \* \*

(8) 80 MHz bandwidth channels\*

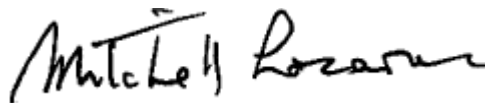
<b>Transmit (receive) (MHz)</b>	<b>Receive (transmit) (MHz)</b>
10755	11245
10835	11325
10915	11405
10995	11485
11075	11565
11155	11645

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

## CONCLUSION

We urge the Commission to make the above corrections to Section 101.147 at the earliest possible time.

Respectfully submitted,

A handwritten signature in black ink that reads "Mitchell Lazarus". The signature is written in a cursive style with a prominent initial "M".

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October 5, 2012

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