

Before the
Federal Communications Commission
Washington DC 20554

In the Matter of)	
)	
Amendment of Part 2 of the Commission’s Rules)	
for Federal Earth Stations Communicating with)	
Non-Federal Fixed Satellite Service Space)	
Stations;)	ET Docket No. 13-115
)	
Federal Space Station Use of the 399.9-400.05)	RM-11341
MHz Band; and)	
)	
Allocation of Spectrum for Non-Federal Space)	
Launch Operations)	

**REPLY COMMENTS OF THE
FIXED WIRELESS COMMUNICATIONS COALITION**

The Fixed Wireless Communications Coalition, Inc. (FWCC)¹ files these Reply Comments in the above-captioned proceeding.²

The FWCC supports the first-round comments submitted by Comsearch. By virtue of its long experience as a major frequency coordinator for the Fixed Service (FS) and Fixed Satellite Service (FSS) industries, Comsearch is uniquely positioned to offer informed guidance on the issues before the Commission.

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.

² *Federal Earth Stations Communicating with Non-Federal Fixed Satellite Service Space Stations*, Notice of Proposed Rulemaking and Notice of Inquiry, 28 FCC Rcd 6698 (2013).

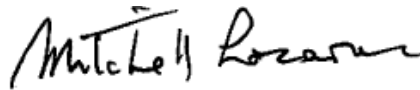
The FWCC agrees with the substantive points raised by Comsearch:

- The Commission should protect Federal earth station users via a footnote to the Table of Allocations, rather than by amending the Table, so as to deny co-primary status to Federal users and thus reinforce their obligation to comply with the Commission's rules and established industry frequency coordination procedures.
- The Commission should require Federal earth station users seeking to operate in shared non-Federal bands to follow the same frequency coordination procedures and industry best practices as are currently required for non-Federal users under Parts 25 and 101.
- The Commission should likewise require Federal users whose earth stations receive protected status in a shared band to participate in the Part 25/Part 101 frequency coordination process, rather than file oppositions later in response to public notice of FCC applications.
- Procedures that provide interference protection to Federal earth stations must not delay frequency coordination or the issuance of licenses to non-Federal applicants in shared bands.
- The Commission should delete the extended Ku downlink band from its proposed policy to provide Federal earth stations with protected status, so as to preserve the 10.7-11.7 GHz band for badly needed FS links.

CONCLUSION

The FWCC has no objection to Federal access to non-Federal satellite spectrum so long as Federal users comply with all established frequency coordination procedures and industry practices.

Respectfully submitted,



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