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November 16, 1999

EX PARTE OR LATE FILED

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: IB Docket No. 99-81, RM-9238;  
ET Docket No. 95-18, RM-7927  
RM-9649  
Ex Parte Presentation

Dear Madam Secretary:

On November 16, 1999, representatives of the Fixed Wireless Communications Coalition (Leonard R. Raish, Thomas J. Keller, Robert Gurs, Randy Young and Brett Kilbourne), made a written ex parte presentation in connection with the three above-referenced proceedings to the staff of the Wireless Telecommunications Bureau (Thomas Sugrue, Diane Cornell, D'Wana Terry, Thomas Stanley, Walter Strack and Michael Pollak). A copy of the written presentation is attached hereto.

Any questions concerning this matter should be directed to the undersigned.

Respectfully submitted,



Thomas J. Keller

Enclosure

cc: T. Sugrue  
D. Cornell  
D. Terry  
T. Stanley  
W. Strack  
M. Pollack

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**FIXED WIRELESS  
COMMUNICATIONS COALITION**

Briefing

for

Thomas Sugrue, Chief  
Wireless Telecommunications Bureau

November 16, 1999

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# **FIXED WIRELESS COMMUNICATIONS COALITION**

1. We are concerned about assuring the future viability of the terrestrial fixed service.
2. The subject is Docket 99-81 on establishment of Policies and Service Rules for MSS in the 2 GHz Band.
  - Provision of feeder links in the spectrum between 5 GHz and 29 GHz is involved. Virtually all feeder link proposals overlap with bands already heavily used for terrestrial fixed services.
3. The FWCC stands on its Comments and Reply Comments filed in Docket 99-81.
  - Intention is to be helpful.
  - A course of action is proposed rather than total opposition.
4. Attention is called to the FWCC Petition for Rulemaking in RM-9649 - the "full band - full arc" Petition.

# **U.S. Economic Infrastructure is Heavily Dependent on Fixed Wireless Technology:**

- Cellular, Paging and PCS Backhaul
- Railroads, Pipelines, Water & Gas Utilities
- Public Safety Communications
- SMATV/Wireless Television
- Competitive Local Telecommunications Services

# FS Supports Competition in Communications:

- Long Distance (FS Microwave)
- Wireless (Backbone/Backhaul)
- Television-(SMA TV/Wireless Cable/CARS)
- Digital TV (Studio-Transmitter Links, Temporary Fixed, ENG)
- Broadcast (Studio-Transmitter Links, Temporary Fixed, ENG)
- Telephony (Wireless Local Loop, CLEC Network Overlay, Quick Start)
- Internet (Local connectivity at high data rates)
- In addition, FS is “in the background” of essential infrastructure and public safety functions
- 416,000 Channel licenses have been granted by the FCC (Area license activity is in addition to this)
- FS is a growth industry (over 10,000 new coordinations listed in 1998)
- Fixed wireless service is a major constituency of the FCC

# ISSUES

- There is only one spectrum
- Reallocation of bands from one use to another -- displacement of existing services must be done equitably
- Balance effect on incumbents with potential benefit to new user
- Existing high use fixed bands are being squeezed (2 GHz, 6 GHz, 11 GHz, 18 GHz and above)
  - ▶ FS Growth
  - ▶ Fixed microwave is a growth industry
- Need to accommodate existing and future needs of fixed wireless licensees
  - ▶ Very spectrally efficient new technologies
  - ▶ Very efficient geographic reuse

# FWCC VIEWS

1. A sequence of apparently unrelated Commission decisions affecting several bands between 2 and 30 GHz has already seriously curtailed Fixed Service operators' access to spectrum needed for new terrestrial systems and for growth of existing ones.
2. If MSS feeder links are to be superimposed on spectrum already used for terrestrial fixed systems, any such action should be delayed until sharing criteria and coordination rules can be developed and promulgated, especially in light of spectrum already lost to accommodate the satellite services.
3. If the Commission does decide to require sharing in the bands proposed for feeder links, it must prevent the same kind of "sterilization" that occurred at 4 GHz.

## **FWCC VIEWS (Cont.d)**

4. The Commission should impose reasonable restrictions on MSS feeder link earth station numbers, collocation, siting, antenna size, shielding, and spectrum efficiency. Coordination procedures should be established that will yield equitable sharing of geography and spectrum.
  
5. As regards the relocation of FS from 2 GHz to accommodate MSS, terrestrial FS and MSS service links cannot share spectrum. Note is taken 2165-2200 MHz has been allocated for MSS downlinks.
  - Commission should reiterate that microwave licensees are to be reimbursed for relocation costs.
  - Such costs can be as much as \$450,000.00 per link.



## **FWCC VIEWS (Cont.d)**

- Since 2 GHz “hops” are capable of longer path lengths, relocation to higher bands could result in “multi-hop” links as replacement for a single “hop.”
- Fiber is not always an alternative due to terrain conditions and remoteness.