

Before the
Federal Communications Commission
Washington DC 20554

In the Matter of)	
)	
Fixed Wireless Communications Coalition,)	
Amendment of Sections 101.109 and 101.147)	RM-11417
of the Commission's Rules to Accommodate)	
30 MHz Channels in the 6525-6875 MHz Band)	

**COMMENTS OF THE
FIXED WIRELESS COMMUNICATIONS COALITION**

Pursuant to Section 1.405 of the Commission's Rules, the Fixed Wireless Communications Coalition files these comments concerning its above-captioned Petition for Rulemaking.¹

That Petition requests an amendment to Sections 101.109(c) and 101.147(l) of the Commission's Rules to authorize 30 MHz channels in the 6525-6875 MHz (Upper 6 GHz) fixed service band.

¹ See Report No. 2852, Consumer & Governmental Affairs Bureau, Reference Information Center, Petition For Rulemakings Filed (released Feb. 28, 2008).

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, 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 and private cable 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.

Although a member of the FWCC, the American Petroleum Institute did not participate in the Petition or these comments.

The present rules authorize 30 MHz channels in the Lower 6 GHz band (5925-6425 MHz), putting the maximum bandwidth in the Upper 6 at only 10 MHz. This would not be a problem if fixed service operators could coordinate as needed in the Lower 6. That band, however, is shared with a great many Fixed Satellite Service uplink earth stations. Each of those is routinely coordinated for the entire 5925-6425 MHz band, and over the entire geosynchronous arc, even if the earth station actually communicates with only one transponder on one satellite. As a result, coordinating Lower 6 fixed service links has become difficult or impossible in parts of the country.

If blocked in the Lower 6, a fixed service operator that is able to get by with a 10 MHz link has the option of trying the Upper 6. But the maximum 10 MHz available there accommodates only about 50 megabits per second.² At a given power, distance, and bit error rate, the only way to raise the data rate is by increasing the radio bandwidth. The proposed rule change would make this possible by allowing 30 MHz channels in the Upper 6 both for new entrants and for 10 MHz users who must expand, in areas where Lower 6 coordination is not feasible.

The only conceivable downside to expanded use of the Upper 6 band would be the routine use of certain frequencies in that band identified for emergency restoration, maintenance bypass, and other special temporary-fixed purposes.³ The FWCC Petition eliminates that downside by specifically excluding those frequencies from 30 MHz authorization.

² The Commission requires a 10 MHz channel to be capable of at least 44.7 megabits per second. 47 C.F.R. Sec. 101.141(a)(3) (table).

³ 47 C.F.R. Sec. 101.147(1)(7) note 2.

CONCLUSION

A grant of the FWCC Petition would allow fixed service operators to provide better, faster service with no evident disadvantage to anyone. We urge the Commission to issue a Notice of Proposed Rulemaking at the earliest possible date.

Respectfully submitted,

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