

Before the
Federal Communications Commission
Washington DC 20554

In the Matter of)	
)	
Fixed Wireless Communications Coalition,)	
Petition to Amend Part 101 of the)	RM-11602
Commission's Rules to Authorize 60 and)	
80 MHz Channels in Certain Bands)	
for Broadband Communications)	

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

Pursuant to Section 1.405(b) of the Commission's Rules, the Fixed Wireless Communications Coalition (FWCC)¹ files this reply comment in support of the above-captioned rulemaking petition.²

The FWCC is the original proponent of this rulemaking. We asked the Commission to allow an operator in the 11 GHz or Lower 6 GHz band to combine adjacent 30 or 40 MHz channels and treat them as a single 60 or 80 MHz channel, respectively. We explained that this will help to satisfy the demand for backhaul to serve the coming expansion of mobile broadband.

Three comments were filed. Two support the proposal, one with conditions; the third opposes it.

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, 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.

² *Consumer & Governmental Affairs Bureau Reference Information Center Petition for Rulemakings Filed*, Report No. 2908 (released June 4, 2010).

Discussion of Comments

The National Spectrum Management Association (NSMA) believes the FWCC proposal has merit and would benefit users,³ but asks the Commission to consider adding certain conditions:

- a showing of necessity and availability for applications planning use of more than one or two 60/80 MHz wide channels on any one path;
- constraints requiring licensees to first attempt use of these channels on predetermined frequencies, for example, starting at one of the band edges;
- appropriate loading and payload requirements scaled to the wider bandwidth channels; and
- consideration of methods to better assure high utilization with more tightly drawn regulations.⁴

We concur with all of these proposals.

The FWCC filed comments to point out that President Obama's recent call for the Commission to make available 500 MHz of broadband spectrum will accelerate the need for backhaul capacity, and hence make this proceeding more urgent.⁵

The sole opposition comes from provider Conterra Ultra Broadband, LLC, which fears that "super channels" will increase the difficulties of frequency coordination and increase problems in delivering services to under- and unserved areas.⁶

³ National Spectrum Management Association at 1. The NSMA describes itself as a voluntary international association of microwave radio/wireless and satellite frequency coordinators, licensees, manufacturers, and regulators, established in 1984, which provides a forum to develop industry guidelines for efficient use and management of the frequency spectrum by the wireless telecommunications community. NSMA at 1 n.1.

⁴ NSMA at 3-4.

⁵ Fixed Wireless Communications Coalition at 2.

We respectfully disagree. Operators today that need 60 or 80 MHz of capacity can (and do) obtain it simply by coordinating multiple 30 or 40 MHz channels on the same path. NSMA calls this a “common practice.”⁷ Our proposal does not make channel occupancy any worse; the NSMA recommendations above will ensure that. If anything, the availability of 60 and 80 MHz channels will improve efficiency by putting into productive use the frequency space near adjacent channel edges, where signals must otherwise be attenuated. NSMA also notes that combining adjacent channels will facilitate frequency coordination by reducing the incidence of potential adjacent channel interference, relative to the use of non-adjacent individual channels.⁸

⁶ Conterra Ultra Broadband, LLC at 2. Conterra argues the rulemaking should await a concurrent increase in available spectrum in these bands, or the release of unused allocations. *Id.* The FWCC has requested private sharing in the Government 7125-8500 MHz band. *See* RM-11605. For the reasons set out in text, however, there are only advantages, and no downside, to granting the requested rule change in the existing bands.

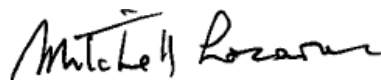
⁷ NSMA at 3 n.3.

⁸ *Id.*

CONCLUSION

The requested rule change will improve the efficiency of high-capacity channels needed to support broadband operations. It is plainly in the public interest. The Commission should release a Notice of Proposed Rulemaking as quickly as possible.

Respectfully submitted,



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July 21, 2010

CERTIFICATE OF SERVICE

I, Deborah N. Lunt, a secretary with the law firm of Fletcher, Heald & Hildreth, PLC, hereby state that true copies of the foregoing Reply Comments of the Fixed Wireless Communications Coalition have been mailed first class, postage prepaid, this 21th day of July, 2010, to the persons named on the attached Service List, except that addresses at the Federal Communications Commission are served by hand delivery.

A handwritten signature in black ink, appearing to read 'D. Lunt', with a long horizontal flourish extending to the right.

Deborah N. Lunt

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