

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

In the Matter of	)	
	)	
Amendment of Part 90 of the Commission's	)	RM-11604
Rules to Improve Interference Protection	)	
in the 3650-3700 MHz Band	)	

**COMMENTS OF THE  
FIXED WIRELESS COMMUNICATIONS COALITION**

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

The FWCC is the original proponent of this rulemaking. We asked the Commission to adopt minor wording changes to Section 90.1319(d) that certain procedures to prevent and resolve interference will become mandatory rather than voluntary. We explained how this will improve the utility of the 3650-3700 MHz band for mobile broadband, fixed wireless broadband access, and backhaul, while retaining the advantages of the present licensing scheme.

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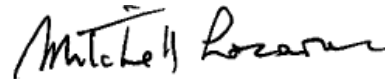
<sup>1</sup> The FWCC is a coalition of companies, associations, and individuals interested in the fixed service – i.e., in terrestrial fixed microwave communications. Our membership includes manufacturers of microwave equipment, licensees of terrestrial fixed microwave systems and their associations, 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](http://www.fwcc.us).

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

We file this comment to note that President Obama recently asked the Commission for a specific plan and timetable for identifying and making available 500 MHz for both mobile and fixed wireless broadband use.<sup>3</sup>

The coming availability of this spectrum will accelerate the need for backhaul capacity, and accordingly will add to the urgency of the present rulemaking. We ask the Commission to release a Notice of Proposed Rulemaking as quickly as possible.

Respectfully submitted,



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<sup>3</sup> *Presidential Memorandum: Unleashing the Wireless Broadband Revolution* (issued June 28, 2010).  
<http://www.whitehouse.gov/the-press-office/presidential-memorandum-unleashing-wireless-broadband-revolution>

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