

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington DC**

In the Matter of)	
)	
Echodyne Corp. Request for Waiver)	WT Docket. No. 17-352
To Permit Licensing and Use of)	
Ground-Based 24.45-24.65 GHz Radar)	
)	

REPLY COMMENTS OF AT&T

AT&T provides these reply comments in response to the Public Notice released by the Federal Communications Commission (“Commission”) on the request of Echodyne Corporation (“Echodyne”) to use the 24.45-24.65 GHz band to provide radiolocation services.¹

The two comments filed in the docket thus far, both by entities involved with Echodyne in developing the radiolocation technology, support grant of the waiver. Likewise, AT&T has no objection to Echodyne’s request and foresees minimal interference concerns in the short term from use of the 24.45-24.65 GHz band.² Long term coexistence in the band is a concern. In the future, Echodyne devices may operate in an ecosystem with an increased number of adjacent channel devices, some of which may present intermodulation risks. Echodyne’s device specifications suggest minimal filtering, making them potentially susceptible to out-of-band emissions in such an environment. Moreover, in the future primary users of the 24.45-24.65 GHz band and adjacent bands may need to predict and detect the operation of Echodyne devices and contact Echodyne to

¹ Echodyne Corp. Request for Waiver to Permit Licensing and Use of Ground-Based 24.45-24.65 GHz Radar, WT Docket No. 17-352, *Public Notice*, 32 FCC Rcd 10278 (2017).

² Few situations justify modifying Commission Rule Part 2 spectrum allocations via waiver. In most cases, adding new categories of services to spectrum allocations would require more extensive vetting through a rulemaking to address all operational considerations and ensure long-term coexistence with other users of the band under deliberation and adjacent bands.

expeditiously resolve any potential interference issues from anticipated and unanticipated uses of those bands.³

These long term interference concerns can be reduced by taking the following measures in granting Echodyne's request: (1) require Echodyne devices to comply with the Commission's Part 87 regulatory framework, (2) authorize ground-based fixed deployments only; (3) authorize use of the 24.45-24.65 GHz band on a secondary basis only; and (4) require a single license for each land station or, if multiple land stations are authorized under a single fleet license, require registration of each land station, with emitter and location information, which will enable future planning around land stations and identification of these stations should interference issues nonetheless arise. Implementing these basic safeguards now can avoid significant complications in the future for Echodyne and neighboring spectrum users.⁴

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Respectfully submitted,



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³ Notably, the Commission recently modified its rules to allow for mobile and flexible use of band pairs adjacent to the 24.45-24.65 GHz band. Use of Spectrum Bands Above 24 GHz For Mobile Radio Services, et al., GN Docket No. 14-177, et al, *Second Report and Order*, FCC 17-152 (2017).

⁴ See, e.g., Technological Advisory Council Spectrum Policy Recommendations, ET Docket No. 17-340, *Public Notice*, 32 FCC Rcd 10160 (2017).