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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Redevelopment of Spectrum to Encourage Innovation in the Use of New Telecommunications Technologies	)	ET Docket No. 92-9

COMMENTS OF
NATIONAL SPECTRUM MANAGERS ASSOCIATION

NATIONAL SPECTRUM MANAGERS ASSOCIATION, INC.
Sambran Sandoval
President

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COMMENTS OF
NATIONAL SPECTRUM MANAGERS ASSOCIATION

The National Spectrum Managers Association (NSMA) submits the following comments in response to the Commission's Notice of Proposed Rule Making (NPRM) in ET Docket No. 92-9. The Commission proposes to establish new areas of the spectrum to be used for emerging telecommunications technologies. These new frequency bands would be designated from 220 MHz of the spectrum between 1.85 and 2.20 GHz. The Commission also proposes to provide a regulatory framework that will enable the existing fixed microwave users in these bands to relocate to other fixed microwave bands with minimum disruption to their operations. Specifically, the Commission proposes that certain existing 2 GHz fixed operations be relocated to the fixed common carrier and private microwave bands above 3 GHz. These comments address the necessity of developing specific channelization in the 4 GHz, 6 GHz, and 11 GHz common carrier bands to accommodate this relocation.

The NSMA, established in 1984, is a voluntary association of individuals involved in the frequency coordination of terrestrial microwave and satellite earth stations. The role of the Association is to supplement the Commission's coordination rules with procedural and technical recommendations developed in an open industry forum which consists of coordinators, licensees, and manufacturers. The NSMA's objective is to make the frequency coordination process more efficient and effective.

The NSMA believes that careful development of microwave channel plans and their efficient utilization is important. Appropriate channelization will enable optimal use of spectrum by the combination of wideband and narrowband systems. In order to supplement those narrowband channels already available to accommodate these systems which may be displaced from 2 GHz, there may be segments of the 4, 6, and 11 GHz common carrier bands which are suitable for such narrowband channelization. While the material below addresses possible accommodation of 2 GHz displacees from the lower common carrier bands, the goal of efficient spectrum utilization and the needs of both narrowband and wideband operators would be served if the Commission were to establish rules that would encourage the displacees to first look for available frequencies in those bands (e.g., 6, 10, and 18 GHz) which already have narrowband channelization and may better match the bandwidth needs of the displacees.

In those instances where the Commission determines that it is appropriate to establish narrowband plans for frequencies currently used by wideband systems, as described below, the rules should specify a plan which would ensure that as few wideband channels as possible are used to support narrowband systems in any geographic area. This will result in minimum impact on current and future wideband users.

As a means of accommodating these narrowband needs, we first consider the 4 GHz band which has been used heavily by common carriers for decades with a conventional 20 MHz channel plan. The band segment 4180-4200 MHz, however, appears to be lightly used and serves as a possible candidate for accommodation of some displaced 2 GHz licensees.

The 6 GHz common carrier band is channelized into 29.65 MHz channels with several different frequency plans in use. Several segments of the band appear to be possible accommodation candidates given their slightly less intensive use. Two of those segments, 5925 - 5930 and 6420 - 6425 MHz, are near the edges of the band and the third, 6168 - 6182 MHz, is between the high (transmit/receive) and low (receive/transmit) channel blocks, these may be useful in the development of a narrowband channel plan.

An analogous situation exists in the 11 GHz common carrier band except that the conventional channel spacing is 40 MHz. A middle 10

MHz segment of the band (11195-11205 MHz) lies between the paired high/low channel blocks. In addition, the 15 MHz segments at the lower and upper edges of the band appear to be lightly used relative to the rest of the band.

As in prior instances in which the Commission has instituted increased sharing of the common carrier microwave bands, the prior frequency coordination requirements (Sections 21.100 and 21.706) have been applied to new entrants. The NSMA believes that continued application of those requirements is appropriate. The NSMA is currently participating in dialogue with the Telecommunications Industry Association (TIA) and other private interests to attempt to resolve these issues of mutual concern.

The NSMA recognizes the potential complexities of this Commission undertaking and, given our interests in interference analysis and frequency coordination, we will follow this proceeding with interest.

Respectfully submitted,

NATIONAL SPECTRUM MANAGERS ASSOCIATION, INC.

By: Sambran Sandoval

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