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FEDERAL COMMUNICATIONS COMMISSION
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20054

In the Matter of)
)
Redevelopment of Spectrum to)
Encourage Innovation in the)
Use of New Telecommunications)
Technologies)

ET Docket No. 92-9

COMMENTS TO THE TELECOMMUNICATIONS INDUSTRY ASSOCIATION
POINT-TO-POINT COMMUNICATIONS SECTION

The Telecommunications Industry Association Fixed Point-to-Point Communications Section ("TIA") hereby submits its comments in regard to ET Docket No. 92-9.

As the major industry association for fixed point-to-point microwave manufactures, the membership of the TIA has a strong interest in the fair and equitable resolution of this issue. We recognize the significant forces motivating the 2 GHz action: the availability of new wireless technologies, the worldwide reallocation of the 2 GHz band at WARC-92, and the desire of Congress and the FCC to maintain the competitive position of the U.S. telecommunications industry in world markets. However, we believe that the proposed 2 GHz relocation should not be treated as an isolated issue. It should be included as a part of a more comprehensive plan that addresses the changing requirements of the fixed point-to-point microwave industry. The current Commission NPRM makes no specific rule changes which would allow the existing and potential fixed point-to-point users to migrate to higher frequency bands.

The TIA recommends that the scope of this proceeding be increased to cover all common carrier and private frequency bands from 2 to 11 GHz and that a detailed

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spectrum management and relocation plan be developed for this range of frequencies. Issues which must be addressed include specific rule changes to Parts 2, 21, 25, and 94 which would:

- * effectuate all proposed reallocations,
- * define eligibility,
- * prescribe band channelization, minimum path lengths, minimum channel loading, and minimum capacity for bandwidth used,
- * establish frequency coordination criteria, and
- * establish antenna standards.

TIA and its Technical Standards Committee stand ready to assist the Commission in meeting these objectives. Attempting the 2 GHz relocation without a comprehensive plan could severely disrupt the entire point-to-point microwave spectrum, creating operational problems and financial hardships for system operators and reducing the effectiveness of point-to-point microwave as a viable communications medium.

Respectfully submitted,

TELECOMMUNICATIONS INDUSTRY ASSOCIATION
FIXED POINT-TO-POINT COMMUNICATIONS SECTION



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