

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

In the Matter of)
)
Expanding Flexible Use of the) GN Docket No. 18-122
3.7 to 4.2 GHz Band)

To: Chief, Office of Engineering and Technology
Chief, International Bureau
Chief, Wireless Telecommunications Bureau

COMMENTS OF THE BROADBAND ACCESS COALITION

The Broadband Access Coalition (“Coalition”) hereby submits its Comments in response to the Commission’s Public Notice seeking comment on the feasibility of allowing commercial wireless services to use or share use of the 3.7 – 4.2 GHz band.¹ The Coalition requests that these Comments and the pleadings and *ex parte* presentations incorporated by reference herein inform the Commission’s preparation of the Report required by the MOBILE NOW Act.

I. Introduction And Summary

From the outset of this proceeding, the Coalition has repeatedly demonstrated the feasibility of allowing commercial licensed point-to-multipoint (“P2MP”) fixed wireless broadband services to share use of the 3.7 – 4.2 GHz band with incumbent Fixed-Satellite Service (“FSS”) and Fixed Service (“FS”) users under Part 101 of the Commission’s Rules.²

¹ Public Notice, *Expanding Flexible Use of the 3.7 – 4.2 GHz Band*, GN Docket No. 18-122, DA 18-446 (rel. May 1, 2018) (“Public Notice”).

² The Public Notice seeks comment on sharing issues among Federal and non-Federal users. *See id.* at 2. The Coalition notes that there is no allocation to Federal users in the 3.7 – 4.2 GHz band. *See* 47 CFR §2.106.

Nearly one year ago, on June 21, 2017, the Coalition filed a [Petition for Rulemaking](#) (the “Petition”) proposing to amend and modernize Parts 25 and 101 of the Commission’s Rules to enable deployment of high-throughput, licensed P2MP fixed wireless broadband services in the 3.7 – 4.2 GHz band in a spectrally efficient manner, while protecting FSS and FS incumbents from harmful interference through Part 101 frequency coordination.³ The Petition proposed specific and concrete rule changes that would enable the immediate introduction of P2MP fixed wireless broadband service into the 3.7 – 4.2 GHz band without disrupting incumbent operations.

Subsequently, the Coalition filed Comments and Reply Comments in response to the Mid-Band NOI.⁴ In its Comments and Reply Comments, the Coalition further demonstrated the feasibility of allowing commercial licensed P2MP fixed wireless broadband services to share use of the 3.7 – 4.2 GHz band with incumbent FSS and FS users.⁵ Consistent with the directive in the Public Notice,⁶ today’s Comments incorporate by reference the Coalition’s Petition and other filings in RM-11791 and its Comments, Reply Comments and *ex parte* presentations in GN Docket No. 17-183.

³ Broadband Access Coalition Petition for Rulemaking, Public Notice, RM-11791, Report No. 3080 (rel. July 7, 2017). The Coalition filed its Reply Comments in RM-11791 on August 22, 2017. *See* <https://ecfsapi.fcc.gov/file/1082219044266/3.7%20GHz%20Band%20Petition%20--%20Reply%20Comments%20--%20FINAL%20as%20FILED%20--%2008.22.17.pdf>.

⁴ *Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz*, Notice of Inquiry, GN Docket No. 17-183, FCC 17-104 (rel. Aug. 3, 2017) (“Mid-Band NOI”).

⁵ *See* [Comments](#) of the Broadband Access Coalition, filed Oct. 2, 2017, and [Reply Comments](#) of the Broadband Access Coalition, filed Nov. 15, 2017, in response to the Mid-Band NOI.

⁶ *See* Public Notice at 1, n.2.

II. Technical Analysis

The Coalition, together with Google,⁷ has undertaken and presented to the Commission an extensive technical analysis showing how P2MP fixed wireless broadband services can effectively and safely share use of the 3.7 – 4.2 GHz band with incumbent FSS users, particularly in large, rural parts of the country, on both a co-channel and non-co-channel basis. The Coalition hereby incorporates by reference its March 29, 2018 *ex parte*, which includes its extensive technical analysis, and asks that the Commission consider this presentation, as well as the Coalition’s other filings in the referenced proceedings, in preparing the 3.7 – 4.2 GHz Report required by the MOBILE NOW Act.⁸

The Coalition emphasizes that a technical analysis of band sharing must be performed with the proper assumptions.⁹ Importantly, the technical characteristics of P2MP are quite different than the technical characteristics of mobile service. For a variety of reasons, sharing between FSS incumbents and mobile users would be quite difficult. By contrast, as the Coalition has repeatedly demonstrated, sharing among FSS incumbents and fixed P2MP providers is readily achievable.

⁷ Google is not a member of the Coalition.

⁸ The technical analysis can be found at: <https://ecfsapi.fcc.gov/file/10329174176162/Notice%20of%20Ex%20Parte%20Meetings%20-%20Broadband%20Access%20Coalition%20and%20Google%20LLC.pdf>.

⁹ In addition, as the Coalition has repeatedly noted, an analysis of the opportunities for sharing the C-band requires that the Commission improve the International Bureau Filing System database so that it contains up-to-date, accurate and targeted data regarding the operation of earth stations receiving in the 3.7 – 4.2 GHz band. *See, e.g.*, the Coalition’s January 24, 2018 *ex parte* filing: <https://ecfsapi.fcc.gov/file/1012418094798/Mid-Band%20NOI%20--%20IBFS%20Update%20Proposal--FINAL%20--%2001.24.18.pdf>. The Coalition appreciates the Commission’s efforts to gather current and accurate information about C-band receive earth stations to inform its sharing decisions going forward.

III. Conclusion

For the reasons set forth above, the Broadband Access Coalition reiterates that it is entirely feasible for commercial P2MP wireless broadband services to share use of the 3.7 – 4.2 GHz band with incumbent FSS and FS users.

Respectfully submitted,

BROADBAND ACCESS COALITION

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