



August 7, 2017

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

RE: Petition for Rulemaking to Amend and Modernize Parts 25 and 101 of the Commission's Rules to Authorize and Facilitate the Deployment of Licensed Point-to-Multipoint Fixed Wireless Broadband Service in the 3700-4200 MHz Band, RM-11791

Dear Ms. Dortch:

Micronet Communications, Inc. is a communications consulting company specializing in interference analysis, frequency coordination, and licensing of Part 101 fixed microwave systems. Frequency coordination of Part 101 microwave links has been our primary business since the company was founded in 1983. We feel we have a valuable perspective and insight in this matter and would like to lend our support to the Broadband Access Coalition petition.

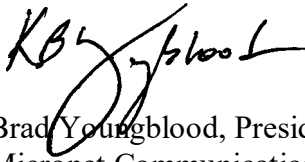
Note that the 4 GHz band (3700-4200MHz) has been largely abandoned by point to point microwave users. This is primarily due to two issues: 1) the "full-band, full-arc" licensing practice by Part 25 satellite earth station licensees and 2) the unusual high-low plan for this frequency band with inconsistent transmit/receive frequency spacing. The latter requires expensive filters and is incompatible with the types of equipment being manufactured today.

There are currently only two part 101 frequency bands that have sufficient spectrum for broadband use, are not susceptible to rain outage, and are useable in all areas of the country. Of these two bands 6 GHz is much preferred due to the issues noted above. However, due to the increase in capacity requirements in the past decade many of these 6 GHz microwave routes are at capacity. 4 GHz would seem to be an option to relieve the bottleneck, however, due to the above licensing issues, manufacturers are no-longer making radio equipment in the band.

The Fixed Wireless Communications Coalition has petitioned the FCC concerning both issues in recent years in an attempt to correct what we believe are weaknesses in the current licensing rules, but no decision has been made yet. We understand that with the current spectrum sharing preferences, that this limited (although necessary) point-to-point microwave use of the band may not be as efficient as the Commission is looking for.

In that light, we see the Broadband Access Coalition petition as a win-win for rural areas and existing carriers, provided the FWCC petitions are also approved. The proposal by the Broadband Access Coalition promises to quickly bring high-speed internet access to millions for the first time. We believe if point-to-point and point-to-multipoint are coordinated, they can coexist nicely. The Commission should issue a Notice of Proposed Rulemaking (NPRM) at the earliest opportunity. This band has been underutilized for too long.

Kind Regards,

A handwritten signature in black ink, appearing to read 'KBY' followed by a stylized flourish and 'Youngblood'.

Brad Youngblood, President  
Micronet Communications, Inc.