

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

In the Matter of	)	
	)	
Petition for Rulemaking to Amend Part 101	)	
Broadband Access and Modernize Parts 25 and 101 of	)	RM-11791
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	)	
	)	

**COMMENTS OF THE  
FIXED WIRELESS COMMUNICATIONS COALITION**

The Fixed Wireless Communications Coalition, Inc. (“FWCC”)<sup>1</sup> files these comments on the Petition for Rulemaking by the Broadband Access Coalition (“BAC”) in the above-captioned docket.<sup>2</sup>

The BAC asks the Commission to authorize a licensed, fixed-wireless, point-to-multipoint, high-speed broadband service in the 3.7-4.2 GHz band so that multiple providers can offer competitive gigabit or near-gigabit service in rural, unserved, and underserved areas. It proposes to protect Fixed Service and Fixed Satellite Service (FSS) operations in the band from

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<sup>1</sup> The FWCC is a coalition of companies, associations, and individuals actively involved in the fixed services—*i.e.*, terrestrial fixed microwave communications. Our membership includes manufacturers of microwave equipment, fixed microwave engineering firms, licensees of terrestrial fixed microwave systems and their associations, and communications service providers and their associations. The membership also includes railroads, public utilities, petroleum and pipeline entities, public safety agencies, cable TV providers, backhaul providers, and/or their respective associations, communications carriers, and telecommunications attorneys and engineers. Our members build, install, and use both licensed and unlicensed point-to-point, point-to-multipoint, and other fixed wireless systems, in frequency bands from 900 MHz to 95 GHz. For more information, see [www.fwcc.us](http://www.fwcc.us).

<sup>2</sup> Petition for Rulemaking of the Broadband Access Coalition, RM-11791 (filed June 21, 2017) (“Petition”).

harmful interference, at first using the current frequency coordination regime and later transitioning to automated frequency coordination.

The Petition endorses the FWCC's pending request for reform of FSS full-band, full-arc frequency coordination which, says the BAC, "massively overprotects FSS to the detriment of fixed terrestrial operations."<sup>3</sup>

The FWCC supports the BAC's request for point-to-multipoint authority at 4 GHz, conditioned on the Commission's protecting present and future fixed links in the band. Grant of the request will offer consumers and businesses badly-needed options for broadband delivery, particularly in areas that current providers choose not to serve, while preserving the utility of the band for its present applications. We concur with the BAC that any efficient use of the band is predicated on eliminating the extreme inefficiencies of FSS full-band, full-arc coordination.

We support the BAC's request for additional channel bandwidths, which parallels one the FWCC filed two years ago.<sup>4</sup>

We support extending the current frequency coordination regime to point-to-multipoint links, but reserve judgment on implementing an automated frequency coordination system until we can see its specifications.<sup>5</sup> We also support, in principle, the plan to coordinate point-to-multipoint installations by service area, and look forward to collaborating with the BAC on the details.

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<sup>3</sup> Petition at 5.

<sup>4</sup> Letter from Cheng-yi Liu and Mitchell Lazarus, Counsel for the Fixed Wireless Communications Coalition, to Marlene H. Dortch, Secretary, FCC in WT Docket No. 10-153 (filed Sept. 27, 2016).

<sup>5</sup> We also reserve judgment on the BAC's request to use time division duplex ("TDD") for point-to-multipoint operations, being concerned that widespread TDD use may hamper frequency coordination with point-to-point links.

Finally, we urge the Commission to keep this proceeding separate from GN Docket No. 17-183, *Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz*, so as to act on it expeditiously. The need is urgent for broadband Internet alternatives, and the adoption of rules that the BAC proposes will have little impact on other options the under the pending GN Docket No. 17-183 Notice of Inquiry.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Cheng-yi Liu'.

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