Channel Number Range	Bandwidth (MHz)	AT&T Plan Channels	Notice Plan Channels
201-299	10.0	17 Pairs 1 One Way	17 Pairs
301-399	5.0	32 Digital Pr. 15 FM Pairs	15 Pairs
401-499	1.6	3 Pairs	45 Pairs
501-599	0.8	6 Pairs	6 Pairs
601-699	0.4	12 Pairs	12 Pairs

In both plans multiple bandwidth applications compete for the same spectrum.

AT&T's plan proposal provides a better match with the needs of the initial displaced users from 2 GHz. The additional 5 MHz channels in the AT&T plan better match the applications being displaced. In addition, the AT&T plan avoids assigning narrow channels which overlap 5 & 10 MHz channels. Thus the large need for displaced 5 & 10 MHz applications can be better accommodated.

The following table describes the proposed frequency plan in more detail:

TABLE 1 - PROPOSED UPPER 6 GHz FREQUENCY PLAN - APPENDIX D - PAGE 3

REF FREQ (MHz)	CHAN NO.	NOTE	CENTER FREQ (MHz)	CHAN NO.	NOTE	CENTER FREQ (MHz)	CHAN NO.	NOTE	CENTER FREQ (MHz)	CHAN NO.	NOTE	CENTER FREQ (MHz)
	Pres. 1.6 MHz			Pres. 800 KHz			Prop. 400 KHz					
6225.00												
6225.10												
6225.30							601A		6525.30			
6225.50				501A		6525.50						
6225.70							602A		6525.70			
6225.90	401A		6525.90									
6226.10							603A		6526.10			
6226.30				502A		6526.30						
6226.50							604A		6526.50			
6226.70												
6226.90							605A		6526.90			
6227.10				503A		6527.10						
6227.30							606A		6527.30			
6227.50	402A		6527.50									
6227.70							607A		6527.70			
6227.90				504A		6527.90						
6228.10							608A		6528.10			
6228.30												
6228.50							609A		6528.50			
6228.70				505A		6528.70						
6228.90							610A		6528.90			
6229.10	403A		6529.10									
6229.30							611A		6529.30			
6229.50				506A		6529.50						
6229.70							612A		6529.70			
6229.90												
	Pres. 10 MHz			Pres. 5 MHz (FM Analog)			Prop. 5 MHz (Digital)					
6530.00												
6535.00	201A	1	6535.00									
6540.00												
6542.50							301A		6542.50			
6545.00	202A	2	6545.00									
6547.50							302A		6547.50			
6550.00				351A		6550.00						
6552.50							303A		6552.50			
6555.00	203A	2	6555.00									
6557.50							304A		6557.50			
6560.00				352A		6560.00						
6562.50							305A		6562.50			
6565.00	204A		6565.00									
6567.50							306A		6567.50			
6570.00												

Note 1 - Reserved for Restoration.
2 - May be assigned for 1-way use.

TABLE 1 - PROPOSED UPPER 6 GHz FREQUENCY PLAN - APPENDIX D - PAGE 4

REF FREQ (MHz)	CHAN NO.	NOTE	CENTER FREQ (MHz)	CHAN NO.	NOTE	CENTER FREQ (MHz)	CHAN NO.	NOTE	CENTER FREQ (MHz)	CHAN NO.	NOTE	CENTER FREQ (MHz)
	Pres. 10 MHz			Pres. 5 MHz (FM Analog)			Prop. 5 MHz (Digital)					
6570.00												
6575.00	201B	1	6575.00									
6580.00												
6582.50							307A		6582.50			
6585.00	205A		6585.00									
6587.50							308A		6587.50			
6590.00				353A		6590.00						
6592.50							309A		6592.50			
6595.00	206A		6595.00									
6597.50							310A		6597.50			
6600.00				354A		6600.00						
6602.50							311A		6602.50			
6605.00	207A		6605.00									
6607.50							312A		6607.50			
6610.00				355A		6610.00						
6612.50							313A		6612.50			
6615.00	208A		6615.00									
6617.50							314A		6617.50			
6620.00				356A		6620.00						
6622.50							315A		6622.50			
6625.00	209A		6625.00									
6627.50							316A		6627.50			
6630.00				357A		6630.00						
6632.50							317A		6632.50			
6635.00	210A		6635.00									
6637.50							318A		6637.50			
6640.00				358A		6640.00						
6642.50							319A		6642.50			
6645.00	211A		6645.00									
6647.50							320A		6647.50			
6650.00				359A		6650.00						
6652.50							321A		6652.50			
6655.00	212A		6655.00									
6657.50							322A		6657.50			
6660.00				360A		6660.00						
6662.50							323A		6662.50			
6665.00	213A		6665.00									
6667.50							334A		6667.50			
6670.00				361A		6670.00						
6672.50							335A		6672.50			
6675.00	214A		6675.00									
6677.50							336A		6677.50			
6680.00				362A		6680.00						
	215A See Below						337A See Below					

Note 1 - Reserved for Restoration.

TABLE 1 - PROPOSED UPPER 6 GHz FREQUENCY PLAN - APPENDIX D - PAGE 5

REF FREQ (MHz)	CHAN NO.	NOTE	CENTER FREQ (MHz)	CHAN NO.	NOTE	CENTER FREQ (MHz)	CHAN NO.	NOTE	CENTER FREQ (MHz)	CHAN NO.	NOTE	CENTER FREQ (MHz)
	Pres. 10 MHz			Pres. 5 MHz (FM Analog)			Prop. 5 MHz (Digital)					
6680.00				362A See Above								
6682.50							337A		6682.50			
6685.00	215A		6685.00									
6687.50							328A		6687.50			
6690.00				363A		6690.00						
6692.50							329A		6692.50			
6695.00	216A		6695.00									
6697.50							330A		6697.50			
6700.00				364A		6700.00						
6702.50							331A		6702.50			
6705.00	217A		6705.00									
6707.50							332A		6707.50			
6710.00				365A	1	6710.00						
6712.50							301B		6712.50	Pres. 10 MHz (Unpaired)		
6715.00	202B	2	6715.00									
6717.50							302B		6717.50			
6720.00										218		6720.00
6722.50							303B		6722.50			
6725.00	203B	2	6725.00									
6727.50							304B		6727.50			
6730.00				351B		6730.00						
6732.50							305B		6732.50			
6735.00	204B		6735.00									
6737.50							306B		6737.50			
6740.00				352B		6740.00						
6742.50							307B		6742.50			
6745.00	205B		6745.00									
6747.50							308B		6747.50			
6750.00				353B		6750.00						
6752.50							309B		6752.50			
6755.00	206B		6755.00									
6757.50							310B		6757.50			
6760.00				354B		6760.00						
6762.50							311B		6762.50			
6765.00	207B		6765.00									
6767.50							312B		6767.50			
6770.00				355B		6770.00						
6772.50							313B		6772.50			
6775.00	208B		6775.00									
6777.50							314B		6777.50			
6780.00	209B See Below			356B		6780.00	315B See Below					

Note 1 - Use of this frequency is authorized on a non-interference basis to broadcast operations in the band 6875-7125 MHz.

2 - May be assigned for 1-way use.

TABLE 1 - PROPOSED UPPER 6 GHz FREQUENCY PLAN - APPENDIX D - PAGE 6

REF FREQ (MHz)	CHAN NO.	NOTE	CENTER FREQ (MHz)	CHAN NO.	NOTE	CENTER FREQ (MHz)	CHAN NO.	NOTE	CENTER FREQ (MHz)	CHAN NO.	NOTE	CENTER FREQ (MHz)
	Pres. 10 MHz			Pres. 5 MHz (FM Analog)			Prop. 5 MHz (Digital)					
6780.00				356B See Above								
6782.50							315B		6782.50			
6785.00	209B		6785.00									
6787.50							316B		6787.50			
6790.00				357B		6790.00						
6792.50							317B		6792.50			
6795.00	210B		6795.00									
6797.50							318B		6797.50			
6800.00				358B		6800.00						
6802.50							319B		6802.50			
6805.00	211B		6805.00									
6807.50							320B		6807.50			
6810.00				359B		6810.00						
6812.50							321B		6812.50			
6815.00	212B		6815.00									
6817.50							322B		6817.50			
6820.00				360B		6820.00						
6822.50							323B		6822.50			
6825.00	213B		6825.00									
6827.50							324B		6827.50			
6830.00				361B		6830.00						
6832.50							325B		6832.50			
6835.00	214B		6835.00									
6837.50							326B		6837.50			
6840.00				362B		6840.00						
6842.50							327B		6842.50			
6845.00	215B		6845.00									
6847.50							328B		6847.50			
6850.00				363B		6850.00						
6852.50							329B		6852.50			
6855.00	216B		6855.00									
6857.50							330B		6857.50			
6860.00				364B		6860.00						
6862.50							331B		6862.50			
6865.00	217B		6865.00									
6867.50							332B		6867.50			
6870.00				365B	1	6870.00						
6872.50												

Note 1 - Use of this frequency is authorized on a non-interference basis to broadcast operations in the band 6875-7125 MHz.

TABLE 1 - PROPOSED UPPER 6 GHz FREQUENCY PLAN - APPENDIX D - PAGE 7

REF FREQ (MHz)	CHAN NO.	NOTE	CENTER FREQ (MHz)	CHAN NO.	NOTE	CENTER FREQ (MHz)	CHAN NO.	NOTE	CENTER FREQ (MHz)	CHAN NO.	NOTE	CENTER FREQ (MHz)
	Pres. 1.6 MHz			Pres. 800 KHz			Prop. 400 KHz			Pres. 5 MHz		
6867.50												
6870.00										365B		6870.00
6870.10										Shown above		
6870.30							601B		6870.30			
6870.50				501B		6870.50						
6870.70							602B		6870.70			
6870.90	401B		6870.90									
6871.10							603B		6871.10			
6871.30				502B		6871.30						
6871.50							604B		6871.50			
6871.70												
6871.90							605B		6871.90			
6872.10				503B		6872.10						
6872.30							606B		6872.30			
6872.50	402B		6872.50									
6872.70							607B		6872.70			
6872.90				504B		6872.90						
6873.10							608B		6873.10			
6873.30												
6873.50							609B		6873.50			
6873.70				505B		6873.70						
6873.90							610B		6873.90			
6874.10	403B		6874.10									
6874.30							611B		6874.30			
6874.50				506B		6874.50						
6874.70					1		612B		6874.70			
6874.90												
6875.00												

SUMMARY

	EXISTING 10 MHz	5 MHz (FM)	PROPOSED 5 MHz (Digital)
SHARED CHAN (Prs.)	17.5	15	32
	1.6 MHz	800 KHz	400 KHz
SHARED CHAN (Prs.)	3	6	12

Note 1 - Corrected channel assignment. Existing rules assign this channel to 6873.7 which is duplicated.

The Commission proposes to use Part 21 coordination procedures in the 4, 6, 10 and 11 GHz common carrier bands and Part 94 procedures in the 6 GHz private band.

The NSMA and TIA 14.11 have formed a joint group to harmonize coordination procedures between private and common carrier operations. These modifications are anticipated to reduce some of the highly restrictive requirements that currently exist and provide for Prior Coordination Notices to be necessary in all coordination activities. We support the use of common requirements for both Part 21 and Part 94 by the Commission in its establishment of coordination requirements.

The Commission solicits comments on whether frequency coordinators should establish time limits for the reservations of growth channels, such as a six month reservation period.

The time period proposed for reservation of growth channels is too short. When radio routes are constructed the investment is based upon the expectation that channel growth can occur, as required, to accommodate future needs that may be years in the future. A coordination that reserves capacity for channel growth should be good for at least five years, in order to allow the investment to be justified. In many cases growth occurs over a period of time, exceeding even five years. Limiting the reservation period to just six months would not be sufficient to justify the long term investment of a radio route.

The Commission proposes to modify language in section 94.45 and add language to section 21.710 regarding Automatic Transmitter Power Control (ATPC) that would state that "effective radiated power may be increased without license modification provided that the change is no greater than 3dB."

The addition to Part 21 should be supported, but the 3dB limit is inadequate. ATPC is typically designed for a 10dB increase during degraded conditions. A 3dB limit would not be adequate to overcome the effect of fading conditions in most circumstances. ATPC has been provided by common carrier users with specific waivers by the Commission for a 10dB limit. This has worked well and has not caused harmful interference. The Rule change should allow for a 10dB increase in radiated power.

The Commission solicits comments on the antenna characteristics proposed in Rules section 21.108.

The antenna standards proposed do not reflect current capabilities for antenna directivity. The table should be updated to reflect state of the art antenna characteristics. Using the table proposed would make coordination more difficult and increase the probability of interference.

The Commission does not specifically mention how existing systems will be protected to allow for growth.

Specific language should be incorporated into the Rule changes that allows for growth of existing systems that have already been coordinated.

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