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**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

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**COMMENTS OF Yishai Amsterdamer Telrad Networks LTD**

Respectfully submitted,



By: Yishai Amsterdamer

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Telrad Networks is a global provider of innovative LTE telecom solutions, boasting over 300 4G deployments in 100 countries. Telrad has a large deployment base of WiMAX networks around the globe. Telrad base station platform is a truly SDR that can start as WiMAX/AeroMACS and migrate to A-LTE by software upgrade. For the AeroMACS Telrad has a rich product portfolio that includes base station, CPE and very important ASNGW. Since 1951, the company has been a recognized pioneer in the telecom industry, facilitating the connectivity needs of millions of end-users through operators, ISPs and enterprises around the world. (<https://www.telrad.com>)

**I. CHANNEL MANAGEMENT (NPRM ¶ 40)**

Telrad support the designation of a single nationwide channel manager as stated below:

- A. DESIGNATING A SINGLE, NATIONWIDE CHANNEL MANAGER IS THE BEST WAY TO ENSURE THE CONSISTENT, EFFICIENT AND FAIR MANAGEMENT OF AEROMACS CHANNELS.**

1. A CHANNEL MANAGER WILL ENSURE NATIONWIDE CONSISTENCY FOR ACCESS TO AEROMACS SPECTRUM.
  - a. A CHANNEL MANAGER WILL SAVE ELIGIBLE USERS TIME AND MONEY THAT OTHERWISE WOULD BE SPENT NEGOTIATING DIFFERENT ALLOCATION AND INTERFERENCE PROCEDURES AT EACH AIRPORT.
  - b. USE OF A SINGLE, NATIONWIDE CHANNEL MANAGER WILL PROVIDE AEROMACS USERS WITH ONE POINT OF CONTACT REGARDLESS OF THE AIRPORT AT WHICH THEY ARE OPERATING.
2. THE CHANNEL MANAGER WILL MAXIMIZE THE EFFICIENT USE OF SPECTRUM, ENABLING AEROMACS TO MEET THE UNIQUE NEEDS OF EACH LOCATION.
  - a. COMMUNICATIONS NEEDS VARY FROM AIRPORT TO AIRPORT BASED ON A NUMBER OF FACTORS, INCLUDING AN AIRPORT'S SIZE AND THE REGION OF THE COUNTRY IN WHICH THE AIRPORT IS LOCATED. THE CHANNEL MANAGER WILL ALLOCATE CHANNELS BETWEEN NON-FEDERAL AEROMACS USERS TO MAXIMIZE EFFICIENT USE OF THE SPECTRUM AT EACH AIRPORT.
  - b. THE CHANNEL MANAGER ALSO WILL HELP COORDINATE AEROMACS SPECTRUM ACCESS WITH FEDERAL USERS. THIS COORDINATION WILL ENSURE THE EFFICIENT USE OF AEROMACS SPECTRUM BY EMPLOYING SHARING APPROACHES TAILORED TO THE NEEDS OF THE FEDERAL AND NON-FEDERAL AEROMACS USERS AT EACH AIRPORT.
3. A CHANNEL MANAGER WILL ENSURE FAIR MANAGEMENT OF AEROMACS CHANNELS.
  - a. UNDER THE RULE PROPOSED BY THE WiMAX FORUM, THE CHANNEL MANAGER WILL MAKE ITS SERVICES AVAILABLE ON A NON-DISCRIMINATORY BASIS TO ALL ELIGIBLE AEROMACS USERS.
  - b. TO FURTHER ENSURE FAIR MANAGEMENT OF AEROMACS CHANNELS, THE FCC SHOULD DESIGNATE AS CHANNEL MANAGER AN ENTITY THAT IS: IMPARTIAL; AN EXPERT IN AEROMACS TECHNOLOGY AND APPLICATIONS; AND A NON-PROFIT.

## **II. COORDINATION WITH OTHER AUTHORIZED USERS (NPRM ¶¶ 41-43)**

A channel manager will help promote coordination with other authorized users of the band and will serve as the single point of contact for non-federal AeroMACS users.

## **III. LICENSING AND COORDINATION (NPRM ¶¶ 37, 39)**

Flexible licensing and coordination rules will promote robust deployment of AeroMACS services and applications. Rather than requiring such an onerous individual licensing regime, AeroMACS operations should be licensed by rule. Such an approach would be more administratively efficient and will encourage robust deployment and availability of AeroMACS services and applications.

#### **IV. TECHNICAL RULES (NPRM ¶ 44)**

The FCC should adopt the proposed technical rules based on the requirements currently incorporated in the International Civil Aviation Organization Standards and Recommended Practices and in the RTCA Minimum Operational Performance Standards.

#### **V. CONCLUSION**

National wide manager combined with flexible licensing and coordination rules will be the right approach going forward for the AeroMACS regulation.