

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In The Matter of)	
)	
Use of Spectrum Bands Above 24 GHz For Mobile Radio Services)	GN Docket No. 14-177
)	
Establishing a More Flexible Framework to Facilitate Satellite Operations in the 27.5-28.35 GHz and 37.5-40 GHz Bands)	IB Docket No. 15-256
)	
Petition for Rulemaking of the Fixed Wireless Communications Coalition to Create Service Rules for the 42-43.5 GHz Band)	RM-11664
)	
Amendment of Parts 1, 22, 24, 27, 74, 80 90, 95 And 101 to Establish Uniform License Renewal, Discontinuance of Operation, and Geographic Partitioning and Spectrum Disaggregation Rules And Policies for Certain Wireless Radio Services)	WT Docket No. 10-112
)	
Allocation and Designation of Spectrum Fixed-Satellite Services in the 37.5-38.5 GHz, 40.5-41.5 GHz and 48.2-50.2 GHz Frequency Bands; Allocation of Spectrum to Upgrade Fixed and Mobile Allocations in the 40.5-42.5 GHz Frequency Band; Allocation of Spectrum in the 46.9-47.0 GHz Frequency Band for Wireless Services; and Allocation of Spectrum in the 37.0- 38.0 GHz and 40.0-40.5 GHz for Government Operations)	IB Docket No. 97-95

COMMENTS OF FASTBACK NETWORKS

CBF Networks, Inc. (aka "Fastback Networks") hereby submits its comments to
FCC 16-89 report and order FNPRM from July 14th 2016. Fastback Networks is a

leading provider of wireless backhaul equipment in unlicensed and lightly licensed 5 GHz and mmWave bands.

First, with respect to the Commission's new allocation of the 64-71 GHz band under the Part 15 regulations, we applaud the Commission for this welcomed change that we believe will dramatically improve wireless backhaul service for emerging 5G RAN deployments.

With respect to E Band, the current light licensing method, with its database management, and similar models adopted around the world, has provided an effective solution that on one hand enables quick deployment, and on the other hand has been able to avoid interference between the many thousands of links installed.

Given the extraordinary nature of frequency re-use in these frequencies, we believe that co-existence of access and fixed services in these frequencies is possible under the current regulatory regime, and can be expanded upon in the future by adopting spectrum sharing principles drawn from other unlicensed bands such as recently adopted for 64-71 GHz, but subject to minimum antenna directivity requirements, rather than from complex multi-tiered service bands that use localized and temporary licensing schemes.

With regard to the comments invited in paragraph 440, we would like to put forward the following comments:

- We applaud the Commission for its implementation of current regulatory regime which has inspired industry to develop technology solutions and encourage

investment in the 70 and 80 GHz band. Therefore we recommend that the Commission preserve the current regulatory licensing regime at this time.

- We do not see the need for an SAS system in the 70/80 GHz band. The high frequency and narrow beams (even after some relaxation in antenna requirements) enables efficient spectrum management by the existing database system with small adaptations.
- On the technical rule invited comments we recommend to relax the beam width requirement to 4 degrees to enable MIMO and scanning antennas.
- We do not believe that it is advisable to open this 70/80 GHz band to either “indoor use” or any other use that would encourage “non-directional” antennas. The extreme directivity requirements of the existing 70/80 GHz band, subject to the slight relaxation described above, enables equipment in this band to efficiently re-use this spectrum dynamically, whether under the existing lightly licensed regime or a future unlicensed scenario.

Respectfully Submitted,

/s/ Kevin Negus

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