

Before the
Federal Communications Commission
Washington DC 20554

In the Matter of)	
)	
)	
Expanding Flexible Use of the 3.7 GHz to 4.2)	GN Docket No. 18-122
GHz Band))	RM-11791
)	RM-11778
)	
)	
)	

**REPLY COMMENTS OF THE
NATIONAL SPECTRUM MANAGEMENT ASSOCIATION**

The National Spectrum Management Association (“NSMA”)¹ submits these reply comments regarding the Order and Notice of Proposed Rulemaking in the above-captioned proceeding ².

The Commission proposes to limit the expansion of fixed point to point systems in the 3.7 to 4.2 GHz band while introducing new mobile services. We acknowledge that the band is currently underutilized by the fixed point to point community primarily due to existing coordination procedures utilized for sharing the band with fixed satellite service. We see little harm in limiting the expansion of fixed point to point service. However, we believe the existing

¹ The NSMA is a voluntary association of individuals involved in the spectrum management profession including service providers, manufacturers, frequency coordinators, engineers and consultants. NSMA’s goal is to promote rational spectrum policy through consensus views formulated by representatives of diverse segments of the wireless industry.

² *Expanding Flexible Use of the 3.7 GHz to 4.2 GHz Band*, GN Docket Nos. 18-122, 17-183 (Inquiry Terminated as to 3.7-4.2 GHz), Order and Notice of Proposed Rulemaking, FCC 18-91 (released July 13, 2018) (“Notice”).

services should either be protected in place or the operators compensated to move their radio operations to another frequency band.

In the previous comments, several parties have made Comments regarding new frequency coordination procedures, location accuracy, power limits, and various technical standards. All of these are factors that can be used in maintaining interference protection which we acknowledge are helpful to those new services. We have no objection to these proposals as long as they are not imposed upon existing fixed point to point systems.

Comments have proposed changing the equipment or operation of existing fixed point to point systems. We believe these suggestions are impractical and unwarranted.

The Commission proposes to “sunset” existing fixed point to point services³. We suggest that if those services are “sunset”, the operators be compensated for the costs of moving their services to other frequencies.

CONCLUSION

The NSMA requests that (1) any such Part 101 rule changes be limited to the 3.7-4.2 GHz band; (2) the changes not be made applicable to existing fixed point-to-point links, and (3) existing fixed point-to-point links be fully protected from interference, per the existing standards, from systems operating under the new rules. If the fixed point to point services are “sunset”, we request that operators be compensated for moving their services to other frequencies.

³ Notice at 48.

Respectfully submitted,

A handwritten signature in cursive script that reads "George Kizer".

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