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H. Mark Gibson



COMSEARCH

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November 8, 1993

Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

RE: Response To Apple Computer's Petition For Reconsideration, ET Docket 92-9

Dear Secretary,

Enclosed herewith are one (1) original, and five (5) copies of our comments in the above-mentioned proceeding. Please direct any questions concerning this filing to me. Please note, this filing is late due to problems with a courier.

Sincerely,

COMSEARCH

H. Mark Gibson
Senior Engineer, PCS Development

HMG:me

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Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In The Matter Of)
)
Amendment of the Commission's)
Rules to Establish New Personal)
Communications Services)

Gen. Docket No. 90-314

92-9

COMMENTS OF COMSEARCH ON APPLE'S PETITION FOR RECONSIDERATION

Comsearch hereby submits the following comments in the above-captioned proceeding.

In their petition for reconsideration, Apple Computer¹ (Apple) made several references to comments made by Comsearch in our response the Emerging Technologies Docket (92-9). We feel the need to offer clarification of those comments as they were removed from context.

Comsearch does not advocate retuning of microwave radios as a panacea for spectrum clearing. Our comments were offered in consideration of a PCS spectrum allocation of 90 - 120 MHz in the 1850 - 1990 MHz band² where there would be non-PCS spectrum

¹ See "Petition for Reconsideration"; September 13, 1993; pp 5 - 6.

² See Notice of Proposed Rule making and Tentative Decision, GEN Docket 92-9, ET Docket 92-100, p. 17. See also Comsearch comments to this proceeding, p. 4.

available for retuning. We have never advocated retuning of microwave radios into spectrum that is to be used by PCS.

In addition, a 10 - 15 year transition period had been proposed for relocating microwave incumbents.³ Such a long transition plan would have provided ample time for a process that proposed microwave system upgrades (even retuning) to permit initial PCS deployment. This is what we meant by "coordinated co-existence"⁴. We further intended that retuning should be considered as a last resort to relocation *only* after attempting to employ other frequency coordination techniques such as antenna and equipment upgrades. While these upgrades may not totally eliminate interference potential, they would permit initial PCS deployment.

Considering the current spectrum allocations and the three year transition period, Comsearch is of the opinion that relocation to another band is the best and most equitable method to clear spectrum for both unlicensed and licensed PCS.

³ See ET NPRM, (92-9) ¶24.

⁴ See Comsearch comments, p 12.

Respectfully Submitted,

COMSEARCH

Prepared By: _____

H. Mark Gibson

Senior Engineer

COMSEARCH

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