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December 3, 1993

**BY HAND DELIVERY**

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
Suite 222  
1919 M Street, N.W.  
Washington, D.C. 20554

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DEC - 3 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

RE: ET Docket No. 92-9  
RM-7981/RM-8004

Dear Mr. Caton:

On behalf of Harris Corporation, Farinon Division, there is transmitted an original and four copies of its Reply Comments of Harris Corporation, Farinon Division, in the above-reference matter.

Should any questions arise concerning this matter, please communicate with this office.

Very truly yours,



George Petrutsas  
Counsel for  
Harris Corporation,  
Farinon Division

GP/bll  
Enclosures

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BEFORE THE

Federal Communications Commission

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WASHINGTON, D.C. 20554

DEC - 13 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Redevelopment of Spectrum to )  
Encourage Innovation in the )  
Use of New Telecommunications )  
Technologies )

ET Docket No. 92-9  
RM-7981  
RM-8004

TO: The Commission

REPLY COMMENTS OF HARRIS CORPORATION, FARINON DIVISION

Harris Corporation, Farinon Division ("Harris"), by counsel, respectfully submits its Reply to Comments filed in this proceeding by Alcatel Network Systems, Inc. ("Alcatel"). Harris responds to those of Alcatel's comments that relate to the Petition for Partial Reconsideration filed in this proceeding by Digital Microwave Corporation ("DMC") on September 13, 1993. DMC sought reconsideration of that part of the Commission's decision which established July 15, 1994, as the deadline for the manufacture and importation of microwave equipment not meeting the efficiency standards adopted by the Commission in its *Second Report and Order* in this proceeding. Alcatel urges the Commission to retain the July 15, 1994 deadline because, Alcatel argues, that deadline provides "more than adequate" notice to manufacturers, permits sales to continue for 3.5 years, and it corresponds to the standard industry product life cycle. Alcatel *Comments*, p. 2. Harris disagrees.

First, Harris disagrees with Alcatel's characterization of the Commission's decision adopting the transition plan

recommended by the TIA and the Joint Commenters. In Harris' view, the 3DS3 utilization for 40 MHz channels applies to the 11 GHz band only. Secondly, Harris submits that TIA and the Joint Commenters recommended a universal 3.5 years transition period (including all manufacturing and selling activities) since both basically occur in the same time period, as explained in Harris' comments filed on November 23, 1993. The 3.5 years transition period was a "hard" compromise of an earlier 5 years proposal. TIA has restated the need for 3.5 transition period in the comments on the DMC petition. The July 15, 1994 deadline was never discussed within TIA as DMC has explained in the its petition.

If ANS gives a six months notice before discontinuing a product, such policy is not typical in the industry. Harris gives, as a strict minimum, a one-year notice to its customers. When possible, notice will be as long as two years. In many cases, such notices are usually given for products which are at the end of their cycle, i.e., usually 10 years, 15 years in some cases.

Harris is not aware of any "typical" product life cycle for the U.S. microwave industry. Cycle length varies with the market segment, with utilities companies typically requiring a 10 to 15 years product cycle because of their extended buying cycles.

Alcatel is presently selling products that were first put n the market by Rockwell more than 10 years ago! One of Harris' most successful products today is the DVM6-45 digital radio first

introduced in 1986. This radio is only now maturing and has not started its sales decline yet. In fact, current R&D programs are still improving this product every year. In sum, the approximate length of an hypothetical product cycle for this industry is in the order of 5 to 10 years.

The delivery cycle of the U.S. microwave industry is in no way related to the product cycles and is characteristically very short, in the order of a few weeks. Harris' most successful products have a minimum 23 days delivery cycle with little or no finished goods inventory (Harris believes that a near zero inventory is key to the success of U.S. microwave companies).

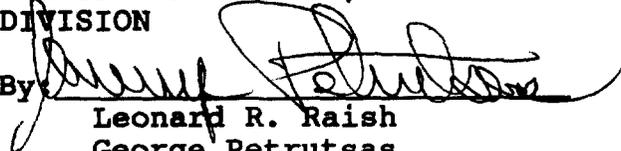
Accordingly, a July, 1994 manufacturing cut-off date translates into a July, 1994 selling cut-off date. It would place significant burdens on at least the two important U.S. based microwave manufacturers. Several U.S. users of microwave equipment which have just started to buy recently designed equipment not meeting the post-1997 spectrum efficiency requirements would equally suffer.

In sum, Harris respectfully submits that Alcatel's arguments against DMC's petition are weak at best and suggest that the public interest would be served by the grant of DMC's petition for partial reconsideration.

-4-

Respectfully submitted,

HARRIS CORPORATION, FARINON  
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December 3, 1993

**CERTIFICATE OF SERVICE**

I, Barbara Lyle, a secretary in the law firm of Fletcher, Heald & Hildreth, do hereby certify that a true copy of the following "Reply Comments of Harris Corporation, Farinon Division" was sent this 3rd day of December, 1993, first-class United States mail, postage prepaid, to the following:

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