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FEDERAL COMMUNICATIONS COMMISSION
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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In the Matter of)	
)	
Amendment of the Commission's)	GEN Docket No. 90-314
Rules to Establish New Personal)	RM-7140, RM-7175, RM-7618
Communications Services)	

To: The Commission

RESPONSE TO PETITIONS FOR RECONSIDERATION

Pursuant to Section 1.429 of the Commission's Rules,¹ Alcatel Network Systems, Inc. ("ANS"),² by its attorney, hereby responds to various petitions for the Commission to reconsider or clarify provisions in the above-captioned decision³ regarding interference protection for fixed microwave operations from personal communications services ("PCS").⁴ These provisions involve: (1) protecting microwave licensees from PCS interference; and (2) increasing PCS base station power limits.

¹47 C.F.R. Section 1.429 (1992).

²ANS is a world leader in manufacturing microwave and lightwave transmission systems.

³Second Report and Order, 8 FCC Rcd 7700 (1993) ("Order").

⁴The Order was published in the Federal Register on November 8, 1993. 58 FR 59174 (Nov. 8, 1993). The Commission's Public Notice, listing all the petitions for reconsideration and clarification of the Order, was published in the Federal Register on December 15, 1993. 58 FR 65595 (Dec. 15, 1993).

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PCS-TO-MICROWAVE INTERFERENCE STANDARDS

In its Petition for Reconsideration of the above-captioned decision, the Fixed Point-to-Point Communication Section of the Network Equipment Division of the Telecommunications Industry Association ("TIA"),⁵ requests that the Commission modify its rules governing protection of fixed microwave licensees from PCS interference. Specifically, TIA requests that the Commission:

- Adopt its nearly completed methodology, "Telecommunications Systems Bulletin No. 10-F, Interference Criteria for Microwave Systems" ("Bulletin 10-F"), as the only standard for determining PCS-to-microwave interference.⁶
- Revise Appendix D to the Order, which sets forth the Commission's PCS-to-microwave interference calculation standards, to permit use of all industry-accepted standards in the interim until Bulletin 10-F is adopted.

ANS, in its Petition for Reconsideration of the Order ("ANS Petition"), supports TIA's approach.⁷ ANS is not alone. Not surprisingly, petitioners addressing the issue of PCS-to-microwave interference unanimously favor reliance only on Bulletin 10-F, once adopted, in lieu of the Commission's procedures set forth in Appendix D.⁸ Moreover, these parties agree that, in the interim, Appendix D must be revised to permit use of other industry-accepted interference

⁵TIA is the principal industry association representing fixed point-to-point microwave equipment manufacturers.

⁶TIA's working group, TIA TR14.11, currently is preparing Bulletin 10-F. This standard updates TIA's "Telecommunications System Bulletin No. 10-E, Interference Criteria for Microwave Systems in the Private Radio Services," (Nov. 1990) ("Bulletin 10-E").

⁷ANS Petition at 2.

⁸Petition for Reconsideration of American Personal Communications ("APC Petition") at 10-11; Telocator Petition for Reconsideration ("Telocator Petition") at 10-13; The American Petroleum Institute's ("API") Petition for Reconsideration of the Second Report and Order ("API Petition") at 3-6; Motorola Inc. Petition for Reconsideration and Clarification of PCS Second Report and Order ("Motorola Petition") at 6-7; Ameritech's Petition for Reconsideration ("Ameritech Petition") at 2-3.

standards.⁹ Thus, ANS strongly urges the Commission, consistent with the unequivocal record of this proceeding, to adopt TIA's recommended changes.¹⁰

One of the petitioners, Bell Atlantic Personal Communications, Inc. ("Bell Atlantic"), proposes certain fine-tuning to the rules adopted for protecting microwave licensees from PCS interference. As detailed below, Bell Atlantic's suggestions have merit, but they must be pursued with caution.¹¹

First, Bell Atlantic recommends that the Commission revise new Section 99.233(b) to eliminate "excess margins," based upon Bulletin 10-E C/I standards, that it purports unnecessarily restrict PCS operations and reduce the amount of possible sharing with incumbents.¹² ANS does not oppose this recommendation. In Bulletin 10-F, TIA will include a standard for calculating signal margins. However, neither TIA, nor any other accredited industry standards group, nor the Commission, should define what constitutes an "excess" margin, especially when it affects services involving safety of life and property. Instead, these objectives have been, and

⁹Motorola Petition at 7; Telocator Petition at 11-13; Ameritech Petition at 3; APC Petition at 11.

¹⁰The law firm of Blooston, Mordkofsky, Jackson, and Dickens ("BMJ&D") requests that the interference protection rules include not only Operational Fixed Service ("OFS") licensees, but also Part 21 Point-to-Point Microwave Radio service licensees. BMJ&D Petition for Partial Reconsideration or for Clarification at 1-2. API and the Utilities Telecommunications Council ("UTC") request that rules be adopted requiring prior coordination with microwave licensees by PCS applicants. API Petition at 6-9; Utilities Telecommunications Council Petition for Reconsideration at 17-18. ANS supports adoption of these proposals.

¹¹ANS appreciates Bell Atlantic's concerns and suggestions. However, ANS, which has been a leader in the TR14.11 Committee efforts to finalize Bulletin 10-F, urges Bell Atlantic to participate in these activities. The TIA TR14.11 Committee is engaging in "real world" empirical tests of PCS-to-microwave interference potential (i.e., with UTAM, Inc., TIA soon will commence tests to determine this potential in the Los Angeles area), and Bell Atlantic's input into these activities is welcome.

¹²Bell Atlantic Petition for Reconsideration ("Bell Atlantic Petition") at 22.

should continue to be, determined by individual users through interaction with appropriate frequency coordinators and potentially affected users.

Second, to minimize adjacent channel interference, Bell Atlantic proposes that the Commission adopt a policy requiring microwave operators to upgrade their system if it would reduce such interference and if the PCS operator would pay the cost of such an upgrade.¹³ ANS supports this proposal, provided that the new microwave facilities, in fact, are comparable to or better than the replaced facilities.

INCREASED PCS BASE STATION POWER LIMITS

To ensure that PCS licensees are able to cover less congested areas, provide cost effective service, utilize current digital radio technology, and be competitive with other mobile services, numerous petitioners request that the Commission increase the maximum PCS base station power limit, set forth in new Section 99.231(a), from 100 watts EIRP to as much as 1600 watts EIRP.¹⁴ ANS, like TIA, does not oppose this request.

The Commission is obligated to protect fixed microwave licensees from interference regardless of the PCS power level.¹⁵ Thus, if higher PCS base station power limits are adopted,

¹³Bell Atlantic Petition at 22-23.

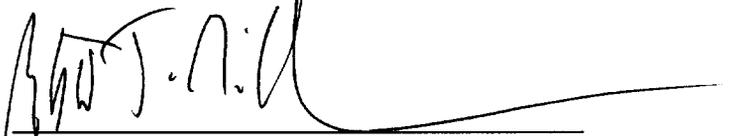
¹⁴APC Petition at 2-8; Telocator Petition at 2-7; Ameritech Petition at 1-2; MCI Telecommunications Corporation Petition for Reconsideration and Clarification at 7-8; Sprint Corporation Petition for Reconsideration and Clarification at 15; US WEST Petition for Expedited Partial Reconsideration and For Clarification ("US WEST Petition") at 2-16; Motorola Petition at 7-8; Northern Telecom Inc. Petition for Reconsideration ("Northern Telecom Petition") at 5-22. A limited number of parties prefer no PCS base station power limitations. PacTel Corporation Petition for Partial Clarification ("PacTel Petition") at 5; Petition for Partial Reconsideration of Time Warner Telecommunications at 12-13; Pacific Bell and Nevada Bell Petition for Reconsideration at 3.

¹⁵Order, 8 FCC Rcd at 7755. See also APC Petition at 7; Telocator Petition at 7; PacTel Petition at 7; US WEST Petition at 15; Northern Telecom Petition at 17-18.

the coordination distance criteria set forth in new Section 99.233(a) must be revised to incorporate the calculation method proposed in Annex F of Bulletin 10-F.¹⁶

Respectfully submitted,

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A handwritten signature in black ink, appearing to read 'R. J. Miller', written over a horizontal line.

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Dated: December 29, 1993

Its Attorney

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¹⁶APC Petition at 8-9.

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I do hereby certify that copies of the foregoing Response to Petitions for Reconsideration will be served by first class mail, postage paid, on the following parties on the 29th day of December, 1993:

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