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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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JAN - 5 1994

January 5, 1994

By Hand

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Re: Ex Parte Presentation
CC Docket No. 92-297
Local Multipoint Distribution Service

Dear Mr. Caton:

On behalf of Suite 12 Group ("Suite 12"), petitioner in the above-referenced proceeding, enclosed please find two (2) copies of a letter which was served on the Chairman and the Commissioners today. Please place two copies of this letter in the above-referenced docket.

Please direct any questions regarding this matter to the undersigned.

Sincerely,



Michael R. Gardner
Charles R. Milkis
Counsel for Suite 12 Group

Enclosures

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Chairman Hundt
Commissioner Quello
Commissioner Barrett
Commissioner Duggan

By Hand

Re: CC Docket No. 92-297, Local Multipoint Distribution Service

In response to untimely "Supplemental Comments" which Motorola Satellite Communications, Inc.'s ("Motorola") has sought to file in the above-referenced proceeding, Suite 12 Group ("Suite 12") today has submitted a Reply, consisting of a technical study entitled "LMDS Cannot Interfere with Motorola Iridium (LEO)," which unequivocally demonstrates that the Local Multipoint Distribution Service will not interfere with Motorola's proposed Iridium satellite system.

Specifically, the Suite 12 study confirms that the Interference to Noise ratio ("I/N") of an LMDS signal into an Iridium receiver, in the worst case, will be approximately -35 dB, well below even the excessive and unsupported I/N of -19 dB which Motorola claims is necessary. The study also identifies a number of flawed assumptions and miscalculations which formed the basis of Motorola's faulty interference analysis. This technical rebuttal to Motorola's interference claim was jointly prepared by Eric N. Barnhart, Chief, Communications and Networking Division, Information Technology and Telecommunications Laboratory, Georgia Institute of Technology, Roger L. Freeman, Roger Freeman Associates and Suite 12 inventor-engineer Bernard B. Bossard.

In view of the conclusions contained in this technical study and the other documents and studies recently placed into the record by Suite 12, and in view of the Commission's own findings expressed in its NPRM released early in 1993, the record in this proceeding overwhelmingly supports the Commission's previously proposed reallocation of the largely unused 28 GHz band for the pro-competitive LMDS, with the issuance of two 1 GHz licenses per service area.

Please direct any questions regarding this matter to the undersigned.

Sincerely,



Michael R. Gardner
Counsel for Suite 12 Group

Enclosure

cc Acting Secretary William F. Caton (for inclusion in the LMDS rulemaking record)