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

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

GEN Docket No. 90-314  
RM-7140, RM-7175, RM-7618

To: The Commission

FURTHER RESPONSE TO PETITIONS FOR RECONSIDERATION

Pursuant to Section 1.429 of the Commission's Rules,<sup>1</sup> Alcatel Network Systems, Inc. ("ANS"),<sup>2</sup> by its attorney, hereby submits its further response to various pleadings concerning the above-captioned decision.<sup>3</sup> These pleadings address petitions for the Commission to reconsider or clarify provisions in the Order regarding interference protection for fixed microwave operations from personal communications services ("PCS").<sup>4</sup>

<sup>1</sup>47 C.F.R. Section 1.429 (1992).

<sup>2</sup>ANS is a world leader in manufacturing microwave and lightwave transmission systems.

<sup>3</sup>Second Report and Order, 8 FCC Rcd 7700 (1993) ("Order").

<sup>4</sup>The 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). The deadline for filing this pleading was extended to January 13, 1994. Order Denying Extension of Time, GEN Docket No. 90-314 (DA 93-1575, released Dec. 29, 1993).

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**BULLETIN 10-F MUST BE ADOPTED AS THE ONLY  
PCS-TO-MICROWAVE INTERFERENCE STANDARD**

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"),<sup>5</sup> 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.<sup>6</sup>
- 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.<sup>7</sup>

TIA's proposals generated unanimous support from PCS and microwave industry representatives in petitions for reconsideration of the Order<sup>8</sup> and in the just completed second round of responsive pleadings.<sup>9</sup> TIA's working group, TIA TR14.11, which includes a broad

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

<sup>6</sup>TIA'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").

<sup>7</sup>TIA Petition for Reconsideration ("TIA Petition") at 6-11.

<sup>8</sup>See ANS' Response to Petitions for Reconsideration ("ANS Response") at 2-3.

<sup>9</sup>UTAM, Inc. Response to Petitions for Reconsideration at 6-8; American Personal Communications Opposition to Petitions for Reconsideration at 22; American Petroleum Institute Statement of Partial Support and Partial Opposition at 2-3; Comments of Telocator at 8-9; Comments on Technical Issues by Telephone and Data Systems, Inc. at 2-3; MCI Opposition at 19-20; Comments of The Association of American Railroads on Petitions for Reconsideration and Clarification ("AAR Comments") at 2-4; Utilities Telecommunications Council Comments on Petitions for Reconsideration ("UTC Comments") at 16-17; TIA Response to Petitions for Reconsideration at 2-6. Pacific Bell and Nevada Bell support the Okumura-Hata propagation model in Bulletin 10-F for suburban and rural systems, but they recommend the COST231 model for urban systems. Opposition and Comments of Pacific Bell and Nevada Bell to Petitions for Reconsideration at 3-4. For the past two years, the industry, led by TIA TR14.11, actively has evaluated various PCS-to-microwave interference models. The COST231 model advocated by

representation by the PCS and microwave industries, anticipates completing Bulletin 10-F at its meeting later this month. Within 30-60 days thereafter, Bulletin 10-F should be adopted by TIA.

Revising the Order so that Bulletin 10-F is the only PCS-to-microwave interference standard is compelled by the clear support in the record. Development of Bulletin 10-F has been the product of industry meetings that have been open to full public participation. Under these circumstances, no further rulemaking should be necessary. Moreover, given the immediacy of Bulletin 10-F adoption, this standard should be available for PCS applicants to design their initial systems without delay.

Out of an abundance of caution, however, TIA and ANS proposed modifying Appendix D so it could be used effectively as an interim interference standard pending adoption of Bulletin 10-F.<sup>10</sup> These modifications are supported unanimously<sup>11</sup> and thus must be adopted.

#### **BELL ATLANTIC'S PROPOSALS**

One petitioner, Bell Atlantic Personal Communications, Inc. ("Bell Atlantic"), recommends that the Commission revise new Section 99.233(b) to eliminate "excess margins."<sup>12</sup> ANS cautioned that 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.<sup>13</sup> Instead, ANS emphasized that these objectives

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Pacific Bell and Nevada Bell never has been submitted to TIA TR14.11 for consideration and thus its relative merit is unclear. Pacific Bell and Nevada Bell are encouraged to attend the next TIA TR14.11 meeting in Washington, D.C. during the last week in January so they can present the COST231 model for review.

<sup>10</sup>TIA Petition at 6-9; ANS Petition for Reconsideration at 7.

<sup>11</sup>ANS Response at 2-3.

<sup>12</sup>Bell Atlantic Petition for Reconsideration ("Bell Atlantic Petition") at 22.

<sup>13</sup>ANS Response at 3.

have been, and should continue to be, determined by individual users through interaction with appropriate frequency coordinators and potentially affected users.<sup>14</sup> Bell Atlantic's proposal, however, was not supported by other parties.<sup>15</sup>

To minimize adjacent channel interference, Bell Atlantic proposes that the Commission adopt a policy requiring a microwave operator to upgrade its system if interference would be reduced and if the PCS operator would pay the cost of such an upgrade.<sup>16</sup> ANS supported this proposal, provided that the new microwave facilities, in fact, are comparable to or better than the replaced facilities.<sup>17</sup> Other parties also support this proposal<sup>18</sup> and thus it should be adopted.

Respectfully submitted,

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<sup>14</sup>ANS Response at 3.

<sup>15</sup>UTC Comments at note 24 (issue more appropriately addressed by TIA); AAR Comments at note 9.

<sup>16</sup>Bell Atlantic Petition at 22-23.

<sup>17</sup>ANS Response at 4.

<sup>18</sup>AAR Comments at 5; MCI Opposition at 20.

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I do hereby certify that copies of the foregoing Further Response to Petitions for Reconsideration will be served by first class mail, postage paid, on the following parties on the 12th day of January, 1994:

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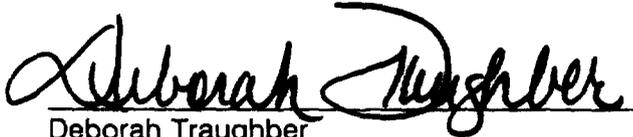
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