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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**

March 16, 1995

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

DOCKET FILE COPY ORIGINAL

Re: WT Docket No. 94-148

Dear Mr. Caton:

In the above-referenced Notice of Proposed Rule Making ("NPRM"), the Commission proposes to simplify the rules for Part 21 and Part 94 fixed microwave services and to consolidate these rules into a new Part 101.¹ Pursuant to Section 1.415 of the Commission's Rules,² Alcatel Network Systems, Inc. ("ANS"),³ by its attorney, hereby replies to the comments on the NPRM.

The Fixed Point-to-Point Communications Section, Network Equipment Division of the Telecommunications Industry Association ("TIA"), and the National Spectrum Managers Association, Inc. ("NSMA"), filed joint comments on the NPRM. In these comments, TIA and NSMA generally

¹NPRM at paras. 1 and 21.

²47 C.F.R. Section 1.415 (1989).

³ANS is a wholly-owned subsidiary of Alcatel Alsthom ("Alcatel"), one of the world's largest corporations (with annual sales in excess of \$30 billion) and the world's largest manufacturer and supplier of telecommunications equipment. In particular, Alcatel is the world's largest independent manufacturer and supplier of microwave radios. Formerly Collins Radio and Rockwell International, ANS, with over \$750 million in annual sales, is a world leader in manufacturing microwave and light wave transmission systems. ANS' equipment is used for a wide range of services, including short, medium and long-haul voice, video and data transmission. Its microwave customers include all the Bell Operating Companies, most major independent telephone companies, cellular operators, power and other utility companies, oil companies, railroads, industrial companies, and state and local government agencies.

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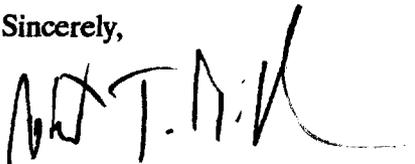
support the Commission's proposals, but also request that the Commission, as part of the NPRM, revise the proposed rules so that: (i) private and common carrier fixed point-to-point microwave users are treated the same; (ii) user-related requirements, such as frequency coordination, interference protection, and transition to a new Part 101, promote spectral efficiency and interference protection; and (iii) equipment-related requirements, such as antenna standards and Automatic Transmitter Power Control ("ATPC"), reflect industry standards.

The record of this proceeding overwhelmingly supports adoption of the rules in the NPRM, with the revisions proposed by TIA/NSMA. As detailed in the TIA/NSMA Joint Reply Comments, to be filed on March 17, 1995, concerns raised in certain of the comments, regarding ATPC and channel loading standards (Section 101.141), have been addressed. In addition, upon further analysis, TIA/NSMA, in the Joint Reply Comments, propose replacing their formula to calculate maximum EIRP for short paths (Section 101.143) with a formula to be submitted by Comsearch in its Reply Comments for this rulemaking. The Comsearch formula is preferable because it permits users to install short paths without significantly sacrificing power. Finally, based upon a review of comments filed in this proceeding, TIA/NSMA propose further revisions to the Part 101 rules which: (i) expand the Section 101.4 grandfather provisions to include equipment, authorized for use in Part 21 or 94 systems, to be used in Part 101 systems; (ii) permit applicants under Sections 101.5 and 101.31 to construct and operate prior to receiving a permanent or temporary authorization; (iii) relax the analog loading criteria in Section 101.141; and (iv) clarify that prior coordination notice only is required with applications for new systems or for "major" modifications, but that all affected parties must be notified that a "minor" modification application has been filed.

ANS is involved significantly in developing the TIA/NSMA proposals. It supports completely the TIA/NSMA Joint Reply Comments filed in the referenced proceeding, including the further rule changes proposed therein. Thus, ANS urges prompt adoption of the NPRM, as revised by TIA/NSMA.

Should there be any questions concerning these reply comments, please contact the undersigned counsel for ANS.

Sincerely,



Robert J. Miller

RJM/dwt

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