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MAY 1 1995

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

May 1, 1995

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

Re: Notice of Ex Parte Presentation  
CC Docket No. 92-297  
ET Docket No. 94-124

Dear Mr. Caton:

On May 1, 1995, representatives of Video/Phone Systems, Inc. ("Video/Phone") met with representatives of the Commission's Office of Plans and Policy to discuss matters related to the Commission's proposal in CC Docket No. 92-297 to establish a Local Multipoint Distribution Service. Also discussed were issues addressed in comments and reply comments in ET Docket No. 94-124. Video/Phone was represented by its president Don Franco and its undersigned counsel, Walter Sonnenfeldt. The Commission was represented by Office of Plans and Policy Chief Robert M. Pepper, Deputy Chief Donald H. Gips, Director of Technology Policy Mark A. Corbitt, and Industry Analyst Amy C. Lesch.

In accordance with Section 1.1206(a)(1) of the Commission's Rules, attached hereto are copies of view graphs used in Video/Phone's presentation. Pursuant to Section 1.1206(a)(2) of the Commission's Rules, one copy of this letter is being submitted herewith. Copies of this letter are also being simultaneously delivered to the above-mentioned Commission representatives.

Very truly yours,



Walter H. Sonnenfeldt  
Counsel to Video/Phone Systems, Inc.

cc: FCC Office Of Plans &  
Policy Staff

# **LMDS/FSS CO-PRIMARY SHARING**

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## **PRESENTATION TO FCC OFFICE OF PLANS AND POLICY**

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**VIDEO/PHONE SYSTEMS, INC.  
May 1, 1995**

# Summary

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- Video/Phone Initiatives
- NarrowBeam<sub>TM</sub> System Description
- LMDS/FSS Sharing Is Feasible
- Sharing Solutions
- Regulation
- LMDS Should Not Be Relocated

# **Video/Phone Sharing Initiatives**

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- **Recognized Complex Sharing Issues Early**
- **Sharing Considerations Incorporated In NarrowBeam<sub>TM</sub> Network Architecture**
- **Opened Dialogue With Satellite & Terrestrial Parties**
- **Proposed LMDS/FSS Negotiated Rulemaking**
- **Major NRMC Participant**
- **Work Ongoing**

# **NarrowBeam<sup>TM</sup> System Description**

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- **Advanced Gallium Arsenide Technology**
- **Multiple Sectors**
- **Full Duplex Broadband Operation**
- **Flexible Deployment**
- **Analog or Digital**
- **Low Cost**
- **Interference Into FSS Can Be Precluded**
- **Advanced System Options Can Eliminate FSS Interference**

# **LMDS/FSS Sharing Is Feasible**

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- **Several Solutions**
- **NRMC Did Not Have Enough Time To Study Solutions**
- **Many Solutions Also Increase System Capacity**

# Sharing Solutions

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- **FSS Into LMDS**
  - Planned Frequency Assignment
  - Dynamic Frequency Assignment
  - Coordination For High Power/High Duty Cycle FSS Terminals
  - CDMA
  - LMDS Hub Diversity
  - Realtime Installation Control
- **LMDS Into FSS**
  - Aggregate LMDS Power Spectral Density Limits
  - Minimum FSS Space Station Receive Gain

# Regulation

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- Technology Neutral
- Burden Shared Equitably
- Unencumbered Portion Of Spectrum For Both Services
- Conditional Access To Additional Spectrum
  - If LMDS System Can Operate In FSS Interference Environment
  - If FSS System Can Operate Without Interfering With LMDS
- Same Conditions For Both LMDS Licensees

# **28 GHz LMDS Should Not Be Relocated**

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- **Sharing at 28 GHz Is Feasible**
- **FSS Parties Have Not Proven Otherwise**
- **The Commission Has Not Proposed To Relocate LMDS**
- **Above 40 GHz Allocation Proposal Mischaracterized By Some FSS Parties**
- **Moving To 40 GHz Would Increase LMDS Deployment Cost At Least 250%**
- **Moving To 40 GHz Would Cause Delays**

# Conclusions

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- Sharing Is Feasible
- There Is No Need To Relocate LMDS
- Current Technology Can Solve Problem
- Burden Should Be Equitably Apportioned
- Commission Should Encourage Serious Industry Consideration of Solutions