

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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Petitions for Rulemaking to Allocate)
the 5 GHz Band and Adopt) RM-8648
Service Rules for a Shared Unlicensed) RM-8653
Personal Radio Network)

To: The Commission

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COMMENTS

Pursuant to Section 1.405 of the Commission's Rules,¹ Alcatel Network Systems, Inc. ("ANS"),² by its attorney, hereby comments on the above-captioned Petitions for Rulemaking (the "Petitions").

The Petitions involve reallocation of the 5 GHz band to accommodate high-speed, high-bandwidth, unlicensed radio services. In RM-8648, the Wireless Information Networks Forum ("WINForum") filed a Petition for Rulemaking ("WINForum Petition") requesting that the 5.10-5.35 GHz band be reallocated for its Shared Unlicensed Personal Radio Network ("SUPERNet"). Similarly, in RM-8653, Apple Computer, Inc. ("Apple") filed a Petition for Rulemaking ("Apple

¹47 C.F.R. Section 1.405 (1994).

²ANS 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 \$500 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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Petition") requesting that the 5.15-5.30 and 5.725-5.875 GHz bands be reallocated to establish the "NII Band."³

In comments filed contemporaneously herewith, the Fixed Point-to-Point Communications Section, Network Equipment Division of the Telecommunications Industry Association ("TIA"), has serious reservations that must be resolved before the 5 GHz band could be reallocated to accommodate the new unlicensed services. Specifically, TIA recommends that the proposed 5 GHz band reallocations should not be adopted until: (i) restrictions on point-to-point paths are imposed; (ii) appropriate EIRP limitations are established; and (iii) necessary band sharing with existing services is demonstrated to be attainable. For the reasons set forth in the TIA comments, ANS herein takes the same position.

Respectfully submitted,

ALCATEL NETWORK SYSTEMS, INC.



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³Given the similarity between the two proposals, the Commission has consolidated the Petitions. See Order Extending Time (DA 95-1254, released June 8, 1995) in which the Chief, Office of Engineering and Technology, consolidated the WINForum Petition and the Apple Petition and established July 10, 1995, as the date for comments on both Petitions.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Comments was sent via first class mail, postage prepaid, to the following parties on the 7th day of July, 1995.

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