

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

1995

In the Matter of	)	
	)	
Amendment of Parts 2 and 15	)	
of the Commission's Rules to Permit	)	ET Docket No. 94-124
Use of Radio Frequencies Above 40 GHz	)	RM-8308
for New Radio Applications	)	

To: The Commission

DOCKET FILE COPY ORIGINAL

**SUPPLEMENTAL COMMENTS**

In response to the Commission's request,<sup>1</sup> Alcatel Network Systems, Inc. ("ANS"),<sup>2</sup> by its attorney, hereby supplements its comments on the above-captioned Notice of Proposed Rule Making ("NPRM")<sup>3</sup> to allocate additional spectrum above 40 GHz.

---

<sup>1</sup>Public Notice, International Harmonization of Frequency Bands Above 40 GHz (DA 95-1415, released June 23, 1995) ("Public Notice").

<sup>2</sup>ANS 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.

<sup>3</sup>Amendment of Parts 2 and 15 of the Commission's Rules to Permit Use of Radio Frequencies Above 40 GHz for New Radio Applications, Notice of Proposed Rule Making, 9 FCC Rcd 7078 (1994).

No. of Copies rec'd  
List A B C D E

04

The Commission proposes, in the NPRM, to reallocate spectrum above 40 GHz for millimeter wave frequency bands.<sup>4</sup> In the Public Notice, the Commission seeks further comment on the "desirability and feasibility of harmonizing" its 40 GHz reallocation proposal in the NPRM with European allocations.<sup>5</sup>

The Fixed Point-to-Point Communications Section, Network Equipment Division of the Telecommunications Industry Association ("TIA"), in response to the NPRM, proposed that the Commission allocate the 48.5 - 51.4 GHz and 55.2 - 58.2 GHz bands exclusively for fixed point-to-point microwave services ("FS"). TIA's proposal, which is supported in the record of this proceeding, was made to accommodate these users' growing need for spectrum to support personal communications services, other wireless networks, and emerging short-haul FS applications.

ANS supports TIA's proposed reallocation of the 40 GHz band for FS users. One of the primary reasons for this support is the conformity between TIA's proposal and European spectrum allocations for the bands above 40 GHz.<sup>6</sup> Optimizing access to global markets is essential for: (i) increasing export of U.S. telecommunications equipment, including FS systems; (ii) encouraging innovation and justifying the high development costs of new technologies, such as millimeter wave equipment; (iii) remaining competitive with overseas manufacturers; and (iv) reducing costs.

TIA's proposal to carve out spectrum above 40 GHz for FS already is included in the

---

<sup>4</sup>NPRM, 9 FCC Rcd at 7078.

<sup>5</sup>Public Notice at 1.

<sup>6</sup>ANS Comments at 2.

most recent "European Table of Frequency Allocations and Utilisations." Moreover, it is consistent with other international efforts to establish comity for spectrum allocations.<sup>7</sup> Thus, to satisfy its goal of harmonizing domestic and international spectrum allocations, and to serve the public interest by taking action to relieve the acute spectrum shortage facing FS users, the Commission must adopt TIA's proposal.

Respectfully submitted,

ALCATEL NETWORK SYSTEMS, INC.

A handwritten signature in black ink, appearing to read "R. J. Miller", is written over a horizontal line.

Robert J. Miller  
Gardere & Wynne, L.L.P.  
1601 Elm Street, Suite 3000  
Dallas, Texas 75201  
(214) 999-3000

Its Attorney

July 27, 1995

222394/gw03

---

<sup>7</sup>The bands proposed by TIA for FS use match interim allocations made by the European Conference of Postal and Telecommunications Administrations, which is responsible for setting European telecommunications standards. In the near future, the International Telecommunications Union, the international standards setting organization, is expected to adopt these allocations for FS use.

## CERTIFICATE OF SERVICE

I hereby certify that on July 27, 1995, a true and correct copy of the foregoing document was mailed by regular mail to the following:

Tom W. Davidson, P.C.  
Akin Gump Strauss Hauer & Feld, L.L.P  
1333 New Hampshire Avenue, NW  
Suite 400  
Washington, D.C. 20036  
Counsel for Teledisc  
Corporation

Rory L. Van Tuyl  
Hewlett-Packard Laboratories  
3500 Deer Creek Road  
Palo Alto, CA 94303-1392

Ernest T. Sanchez, Esq.  
Baker & McKenzie  
815 Connecticut Avenue, NW  
Washington, D.C. 20006-4078  
Counsel for Rand McNally  
& Company

Vann H. Wilber, Director  
Vehicle Safety & International  
American Automobile Manufacturers  
Association  
1401 H Street, NW, Suite 900  
Washington, D.C. 20005

Michael R. Gardner, Esq.  
1150 Connecticut Avenue, NW  
Suite 710  
Washington, D.C. 20036  
Counsel for CellularVision

Erika Z. Jones, Esq.  
Mayer, Brown & Platt  
2000 Pennsylvania, NW, Suite 6500  
Washington, D.C. 20006  
Counsel for General Motors  
Research Corporation

John P. Janka, Esq.  
Latham & Watkins  
1001 Pennsylvania Avenue, NW  
Suite 1300  
Washington, DC. 20004  
Counsel for Hughes  
Communications Galaxy, Inc.

David B. Giguere, Manager Radio Programs,  
Communications Products Business Unit  
Hughes Aircraft Company  
P.O. Box 2999  
Torrance, CA 90509-2999

Richard S. Wilensky, Esq.  
Middleberg Riddle & Gianna  
2323 Bryan Street, Suite 1600  
Dallas, Texas 75201  
Counsel for Comtech Associates, Inc.

Robert L. Riemer, Sr. Program Officer  
National Research Council  
22101 Constitution Avenue, NW  
Washington, D.C. 20418

Norman P. Leventhal, Esq.  
Leventhal, Senter & Lerman  
2000 K Street, NW, Suite 600  
Washington, D.C. 20006  
Counsel for TRW, Inc.

Ronald D. Maines, Esq.  
Maines & Harshman, Chtd.  
2300 M Street, NW, Suite 900  
Washington, D.C. 20037  
Counsel for GHz Equipment Co., Inc. and  
Clarendon Foundation

Todd D. Gray, Esq.  
Dow, Lohnes & Alberston  
1255 23rd Street, NW, Suite 500  
Washington, D.C. 20037  
Counsel for Educational Parties

Dean Norman Waggoner, Ph.D  
Distance Learning & Extended Academic  
Services  
Troy State University  
P.O. Drawer 4419  
Montgomery, AL 36103-4419

James F. Lovette  
Apple Computer, Inc.  
One Infinite Loop, MS: 301-4J  
Cupertino, CA 95014

Thomas E. Kilgo  
Manager, Communication Systems  
Communications & Electronic Systems  
Texas Instruments, Inc.  
P.O. Box 650311  
Dallas, Texas 75265

Charles T. Forest  
Associate Administrator  
for Space Communications  
National Aeronautics & Space Administration  
300 E S.W., Suite 6W17  
Washington, D.C. 20546

Peter B. Teets, President  
Martin Marietta Corporation  
6801 Rockledge Drive  
Bethesda, Maryland

Daniel F. Mallory, President  
VORAD Safety Systems, Inc.  
10802 Willow Court  
San Diego, CA 92127

Eiji Amito  
Sr. Vice President  
American Honda Motor Co., Inc.  
955 L'Enfant Plaza, S.W.  
Suite 5300  
Washington, D.C. 20024

Mark C. Rosenblum, Esq.  
AT&T Corp.  
Room 3261B3  
295 N. Maple Avenue  
Basking Ridge, NJ 07920

Leonard R. Raish, Esq.  
Fletcher, Heald & Hildreth, P.L.C.  
1300 N. 17th Street  
Rosslyn, VA 22209  
Counsel for Harris Corporation -  
Farinon Division

Mitchell Lazarus, Esq.  
Arent Fox  
1150 Connecticut Avenue, N.W.  
Washington, D.C. 20036-5339  
Counsel for Endgate Technology Corporation

Alexander P. Humphrey, Esq.  
General Electric Company  
1750 Old Meadow Road  
McLean, VA 22102

Stephen L. Goodman, Esq.  
Halprin, Temple & Goodman  
1100 New York Avenue, NW  
Suite 650  
Washington, D.C. 20005  
Counsel for Avant-Garde  
Telecommunications, Inc.

Robert M. Knox, President  
Epsilon Lambda Electronics Corp.  
427 Stevens Street  
Geneva, IL 60134

Christopher D. Imlay, Esq.  
Booth, Freret & Imlay  
1233 20th Street, NW  
Suite 204  
Washington, D.C. 20036  
Counsel for The American Radio  
Relay League, Inc.

Jeffrey L. Sheldon, Esq.  
General Counsel  
UTC, The Telecommunications Association  
1140 Connecticut Avenue, N.W., Suite 1140  
Washington, D.C. 20036

Linda C. Sadler, Manager  
Governmental Affairs  
Rockwell International Corporation  
1745 Jefferson Davis Highway  
Suite 1200  
Arlington, VA 22202

Gina Harrison  
Director of Federal Regulatory Relations  
Pacific Telesis  
1275 Pennsylvania Avenue, NW  
Suite 400  
Washington, D.C. 20004

Lawrence J. Movshin  
Wilkinson Barker Knauer & Quinn  
1735 New York Avenue, NW  
Washington, D.C. 20006-5289  
Counsel for Millimeter Wave  
Advisory Group

Henry M. Rivera, Esq.  
Ginsburg, Feldman & Bress, Ltd.  
1250 Connecticut Avenue, NW  
Washington, D.C. 20036  
Counsel for Metricom, Inc.

Hiroshi Kojima  
Secretary General  
Association for Promotion of  
Millimeter-Wave Development  
and Utilization  
1-5-16, Roranomon Minatoku  
Tokyo 105, JAPAN

Hiroshi Furukawa  
Senior Managing Director  
Research & Development Center  
for Radio Systems  
1-5-16, Toranomom Minato-ku  
Tokyo 105, JAPAN

Hiroshi Aoki  
Assistant Manager  
Traffic Control Systems Section  
Applied Electronics Systems Department  
Mitsubishi Electric Corporation  
Kamakura Works  
325, Kamimachiya Kamakura  
Kanegawa 247, JAPAN

Yoshikuni Toko  
General Manager  
Radio and Satellite Communications  
Division  
Fujitsu Limited  
1015, Kamikodanaka, Nakahara-ku  
Kawasaki 211, JAPAN

  
Deborah Traugber

July 27, 1995  
204752/GW03