

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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Amendment to the Commission's)
Rules Regarding a Plan for Sharing)
the Costs of Microwave Relocation)

WT Docket No. 95-157
RM-8643

To: The Commission

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COMMENTS

Pursuant to Section 1.415 of the Commission's Rules,¹ Alcatel Network Systems, Inc. ("ANS"),² by its attorney, hereby comments on the above-captioned Notice of Proposed Rule Making ("NPRM") to establish a plan for microwave facility relocation cost-sharing to facilitate clearance of the 2 GHz band for broadband personal communications services ("PCS").³

In comments filed contemporaneously herewith, the Fixed Point-to-Point Communications Section, Network Equipment Division of the Telecommunications Industry Association ("TIA"), urges the Commission to include adjacent channel interference protection as a relevant factor in determining cost-sharing requirements. Adjacent channel interference potentially could disable PCS or microwave systems.

¹47 C.F.R. Section 1.415 (1995).

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 \$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.

³NPRM at paras. 1-2.

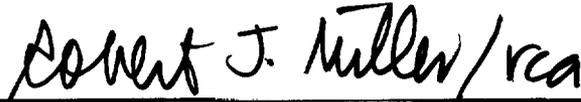
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TIA demonstrates that protection against such harmful interference must be provided and must be a reimbursable cost. For the reasons set forth in the TIA comments, ANS herein takes the same position.⁴

Respectfully submitted,

ALCATEL NETWORK SYSTEMS, INC.

Handwritten signature of Robert J. Miller in cursive script, followed by a horizontal line.

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November 30, 1995

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⁴ANS also supports TIA's other comments regarding specific proposals in the NPRM.