

RECEIVED

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

MAY 7 1997

Federal Communications Commission
Office of Secretary

In the Matter of)	
)	
)	
Allocation and Designation of Spectrum)	IB Docket No. 97-95
for Fixed-Satellite Services in the)	
37.5-38.5 GHz, 40.5-41.5 GHz, and)	
48.2-50.2 GHz Frequency Bands; Allocation)	RM-8811
of Spectrum to Upgrade Fixed and Mobile)	
Allocations in the 40.5-42.5 GHz Frequency)	
Band, Allocation of Spectrum in the)	
46.9-47.0 GHz Frequency Band for Wireless)	
Services; and Allocation of Spectrum in the)	
37.0-38.0 GHz and 40.0-40.5 GHz Bands for)	
Government Operations.)	

To: The Commission

**COMMENTS IN SUPPORT
OF REQUEST FOR EXTENSION
OF REPLY COMMENTS DEADLINE**

In the above-captioned Notice of Proposed Rulemaking ("NPRM"), the Commission proposes several major changes to the millimeter wave bands above 30 GHz. The proposals made in the NPRM are complicated, controversial, and will have far-reaching implications for U.S. telecommunications and information services.

Comments on the NPRM were due May 5, 1997. The Commission established a 15 day period for filing reply comments.

In its May 5, 1997, Request for Extension of Reply Comments Deadline ("Request"), Lockheed Martin Corporation ("Lockheed") seeks an extension of this deadline to June 18, 1997. Given the complexity of the issues involved, the record of the NPRM likely will be too extensive to prepare meaningful reply comments in the limited time available. Moreover, the additional time for

Number of Copies rec'd. 024
DATE

preparing reply comments will afford the terrestrial and satellite interests further opportunity to resolve certain issues on how the 36-51.4 GHz band should be segmented. Thus, the Fixed Point-to-Point Communications Section, Network Equipment Division, of the Telecommunications Industry Association ("TIA"),¹ which filed extensive comments on the NPRM, supports grant of the Request.

Respectfully submitted,

FIXED POINT-TO-POINT COMMUNICATIONS
SECTION, NETWORK EQUIPMENT DIVISION, OF
THE TELECOMMUNICATIONS INDUSTRY
ASSOCIATION

By: Denis Couillard / NPM
DENIS COUILLARD, CHAIRMAN
ERIC SCHIMMEL, VICE PRESIDENT OF TIA
2500 Wilson Boulevard, Suite 300
Arlington, Virginia 22201
(703) 907-7700

Of Counsel:

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

May 6, 1997

290618/gw03

¹TIA is the principal industry association representing all telecommunications equipment manufacturers, including fixed point-to-point microwave radio equipment. TIA members serve, among others, companies, including telephone carriers, utilities, railroads, state and local governments, and cellular carriers, licensed by the Commission to use private and common carrier bands for provision of important and essential telecommunications services.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Comments in Support of Request for Extension of Reply Comments Deadline was sent via first class mail, postage prepaid, on May 6, 1997, to:

Gerald Musarni
Senior Director, Commercial Policy
and Regulatory Affairs
Space and Strategic Missiles Section
Lockheed Martin Corporation
1725 Jefferson Davis Highway
Arlington, Virginia 22202

May 6, 1997


Deborah Mashburn

290618/gw03