

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

JUL 21 1997

In the Matter of )  
 )  
Amendment of Parts 2, 15, 18 and Other )  
Parts of the Commission's Rules to Simplify ) ET Docket No. 97-94  
and Streamline the Equipment Authorization )  
Process for Radio Frequency Equipment )

To: The Commission

**COMMENTS**

Pursuant to Section 1.415 of the Commission's Rules,<sup>1</sup> Alcatel Network Systems, Inc. ("Alcatel"),<sup>2</sup> by its attorneys, hereby comments on the Commission's above-captioned Notice of Proposed Rule Making ("NPRM").<sup>3</sup>

In the NPRM, the Commission proposes updating its equipment authorization rules. As detailed in Comments filed contemporaneously herewith by the Fixed Point-to-Point Communications

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<sup>1</sup>47 C.F.R. §1.415 (1997).

<sup>2</sup>Alcatel is a wholly-owned subsidiary of Alcatel Alsthom, 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 Alsthom is the world's largest independent manufacturer and supplier of microwave radios. Formerly Collins Radio and Rockwell International, Alcatel, with over \$1 billion in annual sales, is a world leader in manufacturing microwave and light wave transmission systems. Alcatel's 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>The NPRM appeared in the Federal Register on May 5, 1997. 62 FR 24383 (May 5, 1997).

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Section, Network Equipment Division of the Telecommunications Industry Association (the "Section"), these proposals will continue the Commission's recent ongoing efforts to expedite introduction of product into the marketplace, while maintaining appropriate safeguards against harmful RF interference ("RFI"). Thus, Alcatel joins the Section in generally supporting adoption of the proposed rules.

Specifically, the Commission, in the NPRM, proposes several changes of particular interest to FS radio manufacturers:

- Declaration of Conformity for microwave transmitters -- To relax the equipment authorization requirements for Part 101 FS transmitters, the Commission proposes that, instead of type notification, these radios would be subject to the self-approval Declaration of Conformity ("DoC") procedure.<sup>4</sup> There is little risk that FS transmitters will generate harmful RFI, and the roll-out of digital radios further reduces any interference potential. Having the self-approval DoC procedure available would expedite delivery of product to the marketplace. Thus, Alcatel agrees with the Section that this proposal must be adopted.
- Elimination of Radio Equipment List -- The Commission currently maintains a Radio Equipment List of transmitters that have been type accepted or notified for operation by the various radio services. It proposes discontinuing this list.<sup>5</sup> While the data on the Radio Equipment List are valuable, if FS transmitters become subject to the DoC procedure, the Section does not oppose its elimination. Alcatel concurs. The Section recommends that the Commission establish a procedure for providing the data, previously available on the Radio Equipment List, to frequency coordinators. At a minimum, the Section urges the Commission to forego taking any action to eliminate the requirement, under Section 101.103(d)(2)(ii)<sup>6</sup> of its Rules, to include equipment information in the prior coordination notice ("PCN"). The Section requests that, if the Commission decides to maintain the type notification

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<sup>4</sup>NPRM at ¶ 18.

<sup>5</sup>NPRM at ¶ 13.

<sup>6</sup>47 C.F.R. §101.103(d)(2)(ii) (1997).

requirement for FS transmitters, the PCN data could substitute for the information provided in the Radio Equipment List. Alcatel supports the Section's proposed approach to ensuring that comparable data are available.

Respectfully submitted,

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By: 

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July 18, 1997

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