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WASHINGTON, DC

September 30, 2015

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Written Ex Parte Presentation  
WT Docket No. 10-153; RM-11610**

Dear Ms. Dortch:

By this letter, the Wireless Internet Service Providers Association (“WISPA”) supports the amendment of Sections 101.109(c) and 101.147(s) of the Commission’s Rules to allow channel sizes of 80 MHz, 160 MHz and 320 MHz in the 21.2-23.6 GHz band (“23 GHz Band”), consistent with the proposal made by Mimosa Networks Inc. (“Mimosa”) in its July 13, 2015 ex parte comments.<sup>1</sup>

As Mimosa points out, the existing 23 GHz Band channel plan adopted in 2002 established a maximum channel size of 50 MHz.<sup>2</sup> In 2012, the Commission amended its rules to permit larger channel sizes for the 6 GHz and 11 GHz bands, stating that it “would serve the public interest by allowing backhaul operators to handle more capacity and offer faster data rates.”<sup>3</sup> However, the Commission deferred action on whether to increase channel sizes for the 23 GHz Band.

WISPA’s members, many of which provide fixed wireless broadband services to rural areas, would benefit significantly from the ability to use wider channels. The continuing increase in demand for bandwidth to support broadband content and streaming video sources requires WISPs to have the ability to increase throughput and speed to improve the customer experience and mitigate network congestion. Wider backhaul channels will enable WISPs to accomplish these objectives, especially in rural areas where fiber may not be available or affordable.<sup>4</sup> Moreover, the IEEE 802.11ac standard is predicated on channel sizes of 80 MHz, 160 MHz and 320 MHz, and incorporating these channel sizes in the 23 GHz Band will help fuel the equipment and technology ecosystem that relies on this standard.

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<sup>1</sup> Ex Parte Comments of Mimosa, WT Docket No. 10-153 and RM-11610 (filed July 13, 2015) (“Mimosa Comments”).

<sup>2</sup> See *id.* at 2.

<sup>3</sup> *Amendment of Part 101 of the Commission’s Rules to Facilitate the Use of Microwave for Wireless Backhaul and Other Uses and to Provide Additional Flexibility to Broadcast Auxiliary Service and Operational Fixed Microwave Licenses*, 27 FCC Red 9735, 9756 (2012).

<sup>4</sup> See Mimosa Comments at 6.

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In sum, the time is right for the Commission to move forward and open the 23 GHz Band to permit wider channel sizes, as proposed by Mimosa.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed electronically via the Electronic Comment Filing System in the above-captioned proceeding.

Respectfully submitted,



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*Counsel to WISPA*