

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of )  
 )  
Requests of Aviat networks and ) WT Docket No. 15-244  
CBF Networks, Inc. d/b/a Fastback Networks )  
For Waiver of Certain Antenna Requirements )  
in the 71-76 and 81-86 GHz Bands )

**COMMENTS OF FASTBACK NETWORKS**

CBF Networks, Inc. (d/b/a Fastback Networks) (“Fastback”) hereby submits these comments in support of the waiver requests (the “Waiver Requests”) filed by it and Aviat Networks (“Aviat”) that are the subject of the above-referenced proceeding. Fastback and Aviat each have requested a partial waiver of the antenna standards for the 71-76/81-86 GHz bands that are set forth in Section 101.115 of the Commission’s rules.

As set forth in Fastback’s Waiver Request, Fastback manufactures high-speed outdoor wireless networking products that connect metropolitan area fiber optic networks to broadband access points such as commercial buildings, cellular base stations, or WiFi hotspots. Its ability to make available its products in the 71-76/81-86 GHz bands has been severely constrained by the antenna standards set forth Section 101.115 of the Commission’s rules. Those rules, as reflected not just in the Waiver Requests of Fastback and Aviat, but in the already submitted comments of other parties in this proceeding, are geared for larger parabolic antennas that are not capable of meeting today’s requirements for smaller, lighter, short range, and less expensive

antennas suitable for installation and operation near street level in congested urban environments.<sup>1</sup>

In 2012, the Fixed Wireless Communications Coalition (“FWCC”) urged that the Commission amend certain provisions of Section 101.115 to permit smaller antennas at 71-76/81-86 GHz.<sup>2</sup> While Fastback supports the broader rule update sought by the FWCC, there is an urgent need for relief now in advance of a rulemaking proceeding, which has yet to be initiated by the Commission, let alone completed.

Fastback further notes the Commission’s recent conclusion that the 71-76/81-86 GHz band does not appear to be usable for the deployment of mobile service itself.<sup>3</sup> That determination only buttresses the need to take better advantage of the band for fixed wireless services that can support mobile broadband operations in other bands. By supporting small cell wireless deployment, the proposals of Fastback and Aviat serve just such a purpose: indeed, not just making more efficient use of the 71-76/81-86 GHz band, but supporting more efficient use of wireless broadband spectrum in the bands in which such services are capable of operation.

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<sup>1</sup> See, e.g., Letter from Kathleen O’Brien Ham, Vice President, Federal Regulatory Affairs, T-Mobile USA, Inc. to Marlene H. Dortch, Secretary, Federal Communications Commission, WT Docket N. 15-244 (Mar. 12, 2015), at 2 (“ By allowing for the use of small, light, unobtrusive antennas in the 71-76/81-86 GHz spectrum, the Commission will create an incentive for much more extensive deployment.”).

<sup>2</sup> See Comments of the Fixed Wireless Communications Coalition in Response to the Commission's Notice of Inquiry in WT Docket No. 10-153 (filed Oct. 5, 2012). The FWCC subsequently filed an *ex parte* request that the Commission apply the co-polar discrimination (CPD) requirement to the range of angles 2.5-5 degrees from the centerline, rather than the 1.2-5 degrees presently required, and reduce the 25 dB cross-polarization discrimination (XPD) requirement to 21 dB. Letter from Mitchell Lazarus, Counsel, FWCC to Marlene H. Dortch, Secretary, FCC in WT Docket No. 10-153 (filed Apr. 4, 2013) (collectively, the “Requested Rule Amendments”).

<sup>3</sup> See *In the Matter of Use of Spectrum Bands Above 24 GHz for Mobile Radio Services*, Notice of Proposed Rulemaking, GN Docket No. 14-177, FCC 15-138 (Oct. 22, 2015, at paras. 86-87).

An expeditious grant of the Fastback and Aviat Waiver Requests will reduce costs, facilitate broadband deployment, and benefit U.S. providers and manufacturers, with no adverse effect on any party. We urge prompt action on these Waiver requests.

Respectfully submitted,



By: \_\_\_\_\_

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November 12, 2015