

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

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

To: The Commission

COMMENTS OF COMSEARCH

Comsearch hereby submits comments on the above-captioned waiver requests.

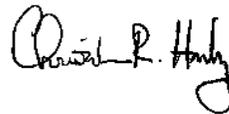
Comsearch agrees the changes to the antenna standards proposed by FWCC are needed and also, in the interim, supports the requested waiver relief.

The record so far reflects confusion as to whether the requested waiver of the antenna standards would apply to any licensee that registers a link, or only to those licensees that have specifically requested relief. T-Mobile and PEG Bandwidth supported Aviat’s waiver request, apparently believing it would apply to them as well. Likewise, Comsearch had understood that the waiver would apply to all licensees. On the other hand Fastback Networks submitted a specific request to be included, and Aviat and RFS requested that RFS be added “as a party to the waiver request.”

Comsearch strongly recommends that if the Commission grants the requested waiver relief, it should apply to all E-band licensees. On the other hand if the Commission only grants

relief to specific licensees, the Commission should clarify how such conditions are to be implemented and enforced in the context of the system of link registration by third-party database managers. For instance, if the Commission intends that database managers should accept link registrations involving waived antennas from certain licensees while rejecting identical registrations from all others, this new authority would need to be ordered and explained. Comsearch opposes such a requirement because of the cost of developing the new capability in the registration database. Granting waiver relief to all as opposed to specific licensees not only would avoid potentially placing such a new requirement on the third-party database managers but would also more fully convey the public interest benefits of small antennas listed by Aviat and commenters in this proceeding.

Respectfully submitted,

A handwritten signature in black ink that reads "Christopher R. Hardy". The signature is written in a cursive style with a large initial "C" and "H".

Christopher R. Hardy
Vice President

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