



5441 Merchant Circle
Suite C
Placerville, CA 95667
Phone 1-530-642-9123
Fax 1-530-642-9420

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MAR 30 2016

FCC Mailroom

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Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Room TWA325
Washington, DC 20554

Re: Statement on Docket No. 13-259 (IEEE-USA Petition)

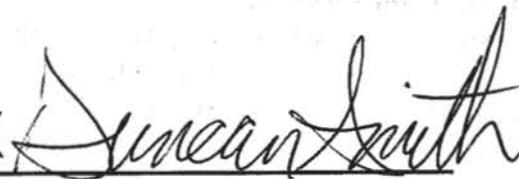
Dear Ms. Dortch:

Norden Millimeter is located in the Sierra Nevada foothills of Northern California and is part of the large technology base that is the continuing expansion of Silicon Valley. Norden Millimeter has extensive experience in product development and manufacturing of millimeter wave amplifier products to specific customer specifications with quality and customer satisfaction the ultimate objective.

Our present products include radio amplifiers up to 110 GHz
(<http://www.nordengroup.com/products/amplifiers/75-to-100-ghz/>)
And oscillators up to 110 GHz.

Under present FCC Rules there is no provision for normal licensed or unlicensed use above 95 GHz, a limit reached in 2003. While this limit does not prevent our sale of components, it certainly limits a normal market by our customers of systems they develop using our technology. The 2+ year delay so far for FCC deliberations on Battelle Memorial Institutes proposal for use of 102-109.5 GHz in RM-11713 (<http://apps.fcc.gov/ecfs/comment/view?id=6017588108>) raises serious issues of the timeliness of FCC action at the upper end of radio technology.

We urge FCC to act positively on the IEEE-USA petition in Docket 13-259 (<http://apps.fcc.gov/ecfs/document/view?id=7520955395>) to assure innovative companies such as ours timely and unimpeded access to market for innovative products that are in the public interest and that do not adversely impact other real or potential spectrum users.

X 
Duncan Smith
President

3/9/16
Date

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