

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Amendment of Parts 25, 74, 78, 90,)
and 101 of the Commission's Rules)
to Facilitate Fixed Point-to-Point Terrestrial)
Microwave Radio Service Licensee Use of)
the 23 GHz and 10 GHz Bands and to)
Eliminate Certain Inconsistencies in)
Such Rules.)

RM No. 9418

To: The Commission

REPLY COMMENTS

In the captioned Petition for Rulemaking ("Petition"),¹ the Fixed Point-to-Point Communications Section, Wireless Communications Division, Telecommunications Industry Association (the "TIA Fixed Section") proposed several needed changes to the 21.2-23.6 GHz band (the "23 GHz Band").² These proposed changes are intended to increase available spectrum for medium or high capacity, short range fixed point-to-point terrestrial microwave radio service ("FS") systems. The proposed changes included making conditional licensing easier, rechannelizing the band and modifying antenna standards.

¹The Petition appeared on the Commission's February 5, 1999, Public Notice, Rep. No. 2309.

²The 23 GHz Band is an untapped resource for FS users. It is allocated for FS use, is shared between non-government and government users, and is especially suitable for medium or high-capacity, short-range systems.

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Several parties submitted comments on the Petition. Pursuant to Section 1.405 of the Commission's Rules,³ Alcatel USA, Inc. ("Alcatel"),⁴ by its attorneys, hereby replies to these comments.

The record is unanimous in its support for the TIA Fixed Section's proposal to make the 23 GHz Band more accessible for FS users,⁵ with the exception of appropriate revisions to the antenna standards suggested by one of the commenters.⁶ Thus, the Commission promptly must grant the Petition and include its proposals, as revised herein, in a formal rulemaking proceeding⁷ to ensure adequate spectrum for essential FS use.⁸

³47 C.F.R. § 1.405 (1999).

⁴Alcatel is a wholly-owned subsidiary of Alcatel Alsthom, one of the world's largest corporations 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 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.

⁵See Comments by Digital Microwave Corporation ("DMC") at 1-2; Harris Corporation — Microwave Division ("Harris") at 1-2; AirTouch Communications, Inc. ("AirTouch") at 4; Andrew Corporation ("Andrew") at 2-3; and Teledesic, LLC at 1.

⁶See Andrew Comments at 3-4.

⁷This rulemaking should be the contemplated Notice of Proposed Rulemaking under the Commission's Biennial Review authority to reevaluate the rules for Part 101 services. See Alcatel Comments at 2 n.4.

⁸Increasing FS user access to the 23 GHz Band is critical. These users provide essential public health and safety services and support emerging wireless technologies.

**THE PROPOSALS REGARDING CHANGES TO
ANTENNA SPECIFICATIONS MUST BE REVISED**

In the Petition, the TIA Fixed Section proposed modifying antenna standards for 23 GHz Band, as well as for 10.55-10.68 GHz band ("10 GHz Band") systems. These changes, which involve reducing the minimum antenna diameter and associated technical specifications, were proposed to facilitate FS user access to those bands for operation of short-distance microwave paths.⁹

Support for these proposals was evident in the comments. AirTouch agreed with the proposed 10 GHz Band antenna modifications.¹⁰ Both DMC and Harris also agreed with the changes for the 23 GHz Band.¹¹

Andrew, however, is concerned because some of its antennas are 1.5 foot in diameter, which would result in non-conformance with certain of the proposed standards.¹² Consequently, Andrew proposes the following changes to the sidelobe suppression standards for the first break point (5° to 10° from the main beam):

Antenna Standards	TIA Petition	Andrew
10 GHz - Cat. A	20 dB	18 dB
10 GHz - Cat. B	20 dB	17 dB
23 GHz - Cat. A	20 dB	18 dB
23 GHz - Cat. B	17 dB	17 dB

These proposed revisions are acceptable and should be adopted. In its Reply Comments filed concurrently herewith, the TIA Fixed Section agrees. The changes are

⁹Petition at Appendix A, Section 8.

¹⁰AirTouch Comments at 2.

¹¹Harris Comments at 4. See also DMC Comments at 4.

¹²Andrew Comments at 3-4.

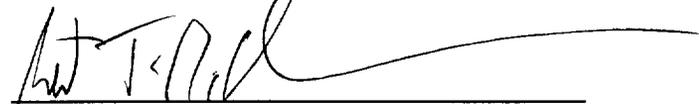
relatively minor and will help Andrew and other antenna manufacturers to market their product in the U.S. and overseas.

CONCLUSION

Additional spectrum is needed to support FS. The 23 GHz Band answers this need because it is a viable solution for FS users. Access to this band will be improved if the recommendations in the Petition, as revised in response to Andrew's suggestion, are adopted. Thus, the Petition must be granted and a formal rulemaking must be established.

Respectfully submitted,

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March 22, 1999

CERTIFICATE OF SERVICE

I, Codi Mitchell, hereby certify that a true and correct copy of the foregoing Reply Comments was sent this 22nd day of March 1999, via first class mail, postage prepaid, to the following:

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