

Federal Communications Commission RECEIVED

WASHINGTON, D.C. 20554

OCT - 6 1999  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Amendment of Part 2 of the Commission's )  
Rules to Allocate Additional Spectrum to the )  
Inter-Satellite, Fixed, and Mobile Services )  
and to Permit Unlicensed Devices to Use )  
Certain Segments in the 50.2-50.4 GHz and )  
51.4-71.0 GHz Bands )

ET Docket No. 99-261

To: The Commission

**REPLY COMMENTS OF THE  
FIXED WIRELESS COMMUNICATIONS COALITION**

The Fixed Wireless Communications Coalition ("FWCC")<sup>1</sup> hereby submits Reply Comments in the above-captioned Notice of Proposed Rulemaking ("Notice") in this proceeding.

In its Comments the FWCC urged the Commission to maintain the 55.78-57.00 GHz band as a licensed band for the fixed and mobile services. The backbone infrastructure for the mobile services require a high degree of stability and availability which would not be the case if the band was allocated for unlicensed usage.

Similarly, the operations of the new Competitive Local Exchange Carriers (CLECS) cannot be conducted in an unlicensed spectrum environment. The CLECs will use these frequencies to by-pass the infrastructure of incumbent operators in the local loop. A higher degree of stability is required than would be possible in an unlicensed environment. The FWCC has no objection to making the 64-66 GHz band

<sup>1</sup>A list of members is included in Attachment A.

No. of Copies rec'd 079  
List ABCDE

available for unlicensed service under Part 15 of the Commission's Rules.

The Comments of Nokia Telecommunications Inc. (NOKIA) and Hewlett-Packard (HP) are noted. However, the FWCC is very concerned that the provision of reliable communications, particularly for the public, would be realistic in an unlicensed spectrum. Spectrum management will be required to guarantee the provision of reliable communications. The Commission should bear this in mind as it considers the future of the 55.78-57.00 GHz band.

In conclusion, the FWCC reiterates its strong objection to the designation of the 55.78-59.0 GHz band as an unlicensed band.

Respectfully submitted,

FIXED WIRELESS COMMUNICATIONS  
COALITION

By: Andrew Krieg  
Member

FIXED WIRELESS COMMUNICATIONS  
COALITION  
1300 North 17<sup>th</sup> Street - 11<sup>th</sup> Floor  
Arlington, VA 22209  
(703) 812-0400

Date: October 6, 1998  
cej/lrr/fwcc/fwcc5.plead

**FIXED WIRELESS COMMUNICATIONS COALITION**

The Fixed Wireless Communications Coalition was formed by terrestrial fixed microwave users and suppliers to assure that adequate spectrum resources are available for current and future terrestrial fixed microwave communications. Such action is necessary because spectrum allocation and re-allocation actions currently under consideration at the FCC require fixed microwave interests to speak with a common voice. Additionally, the Coalition was formed to ensure a favorable regulatory climate both at the FCC and the ITU to permit the manufacture, operation, and use of terrestrial fixed microwave systems.

**MEMBERS****USERS**

Association of Public-Safety Communications Officials  
 American Mobile Telephone Association  
 United Telecom Council (UTC)  
 National Association of Broadcasters  
 Independent Cable Telecommunications Association  
 American Petroleum Institute  
 Wireless Communications Association  
 Personal Communications Industry Association  
 CBS Communications Services  
 Norfolk-Southern Railroad  
 Union Pacific Railroad  
 Burlington-Northern Railroad  
 BellSouth  
 Bell Atlantic  
 SBC Communications, Inc.  
 People's Choice TV  
 Association of American Railroads

**MANUFACTURERS**

Harris Corporation -- Microwave Division  
 Alcatel Network Systems Inc.  
 Digital Microwave Corporation  
 Sierra Digital Communications  
 California Microwave, Microwave Data Systems  
 Tadiran Microwave Networks  
 Spectrapoint Wireless LLC  
 Nortel Networks  
 P-Com, Inc.

**CO-CHAIRS**

Leonard R. Raish  
 Fletcher, Heald & Hildreth, PLC  
 1300 North 17<sup>th</sup> Street, 11<sup>th</sup> Floor  
 Arlington, VA 22209  
 703-812-0400

Thomas J. Keller  
 Verner, Lipfert Bernhard McPherson  
 & Hand, Chartered  
 901 15<sup>th</sup> Street, N.W., Suite 700  
 Washington, D.C. 20005-2301  
 202-371-6060

August 26, 1999

**CERTIFICATE OF SERVICE**

I, Andrew Kreig, do hereby certify that copies of the "Comments"

were sent this 6th day of Oct., 1999, by Hand Delivery, to:

Mr. Dale Hatfield  
Chief, Office of Engineering & Technology  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W. - Room 7C-155  
Washington, D.C. 20554

Mr. Don Abelson  
Chief, International Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Mr. Thomas Sugrue  
Chief, Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W. - Room 3C-252  
Washington, D.C. 20554

Mr. Robert Pepper  
Chief, Office of Plans and Policies  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Andrew Kreig