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1200 EIGHTEENTH STREET, NW
WASHINGTON, DC 20036

TEL 202.730.1300 FAX 202.730.1301
WWW.HARRISWILTSHIRE.COM

ATTORNEYS AT LAW

16 December 1999

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

By Hand Delivery

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: *Notice of Ex Parte Communication: WT Docket No. 99-168*

Dear Ms. Salas:

This letter is being filed on behalf of Coloma Wireless, L.L.C. ("Coloma"). On 15 December 1999, Scott Donohue of Coloma, and undersigned counsel, met with Peter Tenhula of Commissioner Powell's office to discuss issues raised in the *Notice of Proposed Rulemaking* issued in the above-referenced proceeding.

In this meeting, Coloma expressed the views set forth in the attached written presentation.

Respectfully submitted,

Scott Blake Harris

Attachment

cc: Peter A. Tenhula (w/Attachment)

John Charles roe'd 042
LWAACDE

Fixed Wireless Internet Access 746-764 and 776-794 MHz Bands

December 14, 1999

Coloma Wireless, L.L.C. is a past participant in the FCC's auctions process. Coloma's management and investors have won licenses in several auctions and are active participants in the development of wireless communications services.

Following the WCS auction, and in light of the FCC's flexible use policy for the spectrum, Coloma Wireless started the *WCS Forum* to coordinate development of fixed wireless services. Coloma's review of business models and the Forum's technical review process yielded important information about the deployment of fixed wireless services:

- In the case of WCS, spectrum aggregation was necessary to deliver economically viable and sustainable services to customers using wireless technology – many reviewers believed that roughly 30MHz would be necessary to deliver viable services.
- Equipment vendors need to identify a significant economic opportunity to justify investment in product lines and infrastructure – the spectrum allocation should be made in such a way as to reduce barriers to the deployment of fixed wireless services.
- Installation costs (“truck rolls”) are a major service element and a barrier to deploying services profitably in unserved and underserved regions – fixed wireless at the 746-794 MHz frequencies allows innovative companies to develop new deployment models.

From this past experience, Coloma believes that the 746-794 MHz spectrum should be allocated in a manner that permits the provisioning of fixed wireless services to households and businesses.

Spectrum Blocks

For fixed wireless services to be a viable competitor to cable and DSL services, it would be optimal to allocate the full 36 MHz in a single block, but in any event in a block size no less than roughly 30 MHz.

Perhaps more importantly, because this type of fixed wireless access will serve areas which have not been (and may not be) reached by alternative data networks, it is imperative to ensure that customers receive sufficient bandwidth for the future. This points yet again to allocation of “deep” blocks of spectrum of roughly 30 MHz or more. Separation into smaller blocks may inhibit deployment of services to underserved and unserved constituents.