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UNITED STATES DEPARTMENT OF COMMERCE  
National Telecommunications and  
Information Administration  
Washington, D.C. 20230

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

ET Docket 99-261

Mr. Dale N. Hatfield  
Chief, Office of Engineering and Technology  
Federal Communications Commission  
Washington, DC 20554

RE: Notice of Proposed Rulemaking 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 (IRAC Doc No. 31029/2)

Dear Mr. Hatfield:

The National Telecommunications and Information Administration (NTIA), in coordination with the Interdepartment Radio Advisory Committee (IRAC) has reviewed the referenced document and provides the following comments.

1. Paragraph 14 in the NPRM is the only paragraph addressing High Density Fixed Service and reads:

"We also observe that WRC-97 adopted new footnote S5.547, which makes the 51.4-52.6 GHz, 55.78-59.00 GHz and 64-66 GHz bands "available for high-density applications in the fixed service" ("HDFS"). We request comment on whether footnote S5.547 should be adopted domestically, what the ramifications of such an action would be, and whether, in order to assure spectrum availability for HDFS, the bands should *not* be allocated to the mobile service."

Designating specific bands for HDFS is a complex issue that has not been thoroughly discussed nationally. While there is no disagreement with the FCC requesting comments as part of this NPRM, NTIA is concerned that sufficient information may not be obtained to support changes to the National Table of Frequency Allocations regarding HDFS. A subsequent NPRM addressing HDFS may be required to properly address this complex issue. NTIA has already noted that before the band 55.78-56.26 GHz is designated for HDFS, additional technical analysis may be required.<sup>1</sup>

2. Appendix A (Under Part 2 'authority' 2.c) - Footnote S5.557A should be S5.558A, and should be modified as follows:

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<sup>1</sup> Letter from William Hatch to Mr. Dale N. Hatfield, Dated April 30, 1999

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c. In the International Footnotes under heading I., add footnotes S5.138, S5.340, S5.547, S5.553, S5.554, S5.555A, S5.556, S5.556A, S5.556B, S5.557, ~~S5.557A~~, S5.558, S5.558A, and S5.559

3. In Appendix A (2.106 Table of frequency Allocations) – Table entry 50.2-50.4 GHz, the Government and non-Government columns in the US table list both S5.340 and US246. These footnotes appear to be redundant and S5.340 should be deleted.

If you have any questions on these comments, please contact Mr. Edward Davison of my staff at 202-482-3805.

Sincerely,

A handwritten signature in cursive script, appearing to read "William T. Hatch".

William T. Hatch  
Acting Associate Administrator  
Office of Spectrum Management