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January 9, 2001

By Hand Delivery

Mr. Bruce A. Franca
Acting Chief
Office of Engineering and Technology
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: ET Docket No. 98-206
RM-9147, RM-9245
Request for Additional Information

Dear Mr. Franca:

Northpoint Technology, Ltd. and BroadwaveUSA (collectively, "Northpoint"), by this letter, request additional technical information regarding the models for Direct Broadcast Satellite Service ("DBS") unavailability and remediation contours that the Commission developed in conjunction with its First Report and Order and Further Notice of Proposed Rule Making in the above-cited docket ("The MVDDS Order").¹

¹ Amendment of Parts 2 and 25 of the Commission's Rules to Permit Operation of NGSO FSS Systems Co-Frequency with GSO and Terrestrial Systems in the Ku-Band Frequency Range, FCC 00-418 (released December 8, 2000) ("The MVDDS Order").

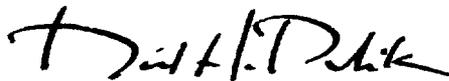
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In Paragraph 218 and in Appendices H and I of the MVDDS Order, the Commission referred to models it has developed for determining average yearly and "worst-month" DBS unavailability and remediation contours. From the analysis that the Commission provided, it appears to Northpoint that the Commission has developed complete engineering models and has coded them into software. As with any complex models, differences in implementation may lead to uncertainties and disputes between interested parties. In order to allow Northpoint and DBS operators to precisely duplicate the Commission's results, Northpoint requests that the source code of the software used to develop the examples in appendices H and I to the MVDDS Order be placed in the public record of this docket. This action would provide all interested parties with the same access to the specific methods and processes that the Commission uses in the calculation of satellite link availability and remediation contours, would minimize the possibility of errors and uncertainties among interested parties who might otherwise use slightly different methods, and would eliminate the duplication of the significant efforts already expended by the Commission staff.

If you have any questions regarding this request, please contact the undersigned or Bob Combs of Northpoint, 400 Capitol Street, N.W., Suite 368, Washington, D.C. 20001, phone: (202) 737-5711. Thank you very much for your consideration of this request.

Sincerely,



David H. Pawlik
Counsel for Northpoint Technology, Ltd.

cc: FCC Secretary (for placement in relevant files)
Ira R. Keltz
Toni Cook Bush
Bob Combs