

Leonard Kolsky*
202.429.6492
lkolsky@step toe.com
* Admitted in MA only

September 6, 2000

Shaun White, Esq.
OET Policy and Rules Division
Federal Communications Commission
445 12th Street, SW
Washington DC 20554

Re: RM 9797, RM 9267, RM 9854

Dear Mr. White:

As you know, ArrayComm, Inc. has been exploring every feasible avenue to identify spectrum that could be utilized effectively for TDD operations.

We understand that OET is in the process of preparing a Notice of Proposed Rule Making that, if adopted by the Commission, would make available certain segments of spectrum for non-Government use. This spectrum consists of various small amounts that the Federal Government transferred to the FCC.

No single one of these segments would satisfy the medium or long-range needs of the TDD community. In fact, the sum total of all the spectrum that will be under consideration, given that a portion of each band will be to some degree, unusable, is probably inadequate.

ArrayComm's engineers, however, believe that its TDD system is so spectrally efficient that with careful engineering a sufficient portion of each band may yield enough utility to enable ArrayComm to initiate service.

RECEIVED
SEP 25 2000
CIB / CIND

No. of Copies rec'd 0
List A B C D E

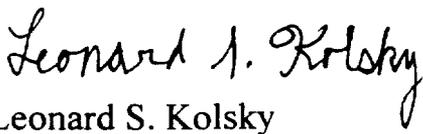
Shaun White, Esq.
September 6, 2000
Page 2

Because each band needs to be investigated, we hope that the Commission's Notice will be sufficiently flexible to allow ArrayComm, and others of course, to pursue the potential of each.

Thus, we want to underscore our interest in the bands referenced in the above RMs as well as other spectrum, larger or smaller in size, that could be used for TDD operations.

As appropriate, please make this letter part of the record in your forthcoming proceeding.

Very truly yours,


Leonard S. Kolsky

STEPTOE & JOHNSON LLP
Counsel for ArrayComm, Inc.

cc: Chairman William E. Kennard
Commissioner Susan Ness
Commissioner Harold Furchtgott-Roth
Commissioner Michael K. Powell
Commissioner Gloria Tristiani
Dale Hatfield
Thomas Shgrue
D'Wana Terry
Julius Knapp