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ATTORNEYS AT LAW

March 17, 2004

Delivered Electronically

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Reconsideration in the 70/80 GHz Band (*WT Docket No. 02-146*)

Dear Ms. Dortch:

This afternoon I spoke with Sandra Danner of the Wireless Telecommunications Bureau, who alerted me to the existence of some unexplained question marks in the Wireless Communications Association's February 23, 2004 petition for reconsideration in this proceeding. Specifically, on pages 12 and 13 of that petition, it appears that WCA is requesting that the Commission either abolish its loading requirement for the 70/80 GHz band, or in the alternative, adopt a loading requirement of "? bps/Hz." This is obviously a mistake.

As I told Ms. Danner on the telephone, WCA's alternative request – assuming the Commission finds it necessary to have any loading requirement at all in the 70/80 GHz bands – is for a loading requirement of one-eighth, or 0.125, bps/Hz. This value was selected by WCA after consideration of a number of deployment scenarios that would be strongly in the public interest, yet would cause the bps/Hz value to fall below 0.25 bps/Hz. The justification is set forth in more detail in the petition.

The question mark made its way into the petition because in the drafting process we used a fractional "one-eighth" symbol, rather than the words "one-eighth" or the numbers "1/8," and when the document was converted to Adobe PDF format the fractional symbol was replaced by a question mark. I apologize for any inconvenience, and ask that this letter be associated with the petition so that the precise nature of WCA's alternative request is clear for public comment.

I am disclosing this presentation pursuant to section 1.1206(b). Please feel free to contact me with any questions about the presentation.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mark A. Grannis", is written over a horizontal line.

Mark A. Grannis

Copy: Sandra Danner