

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Unlicensed Operation in the TV Broadcast Bands)	ET Docket No. 04-186
)	
Additional Spectrum for Unlicensed Devices)	ET Docket No. 02-
380)	
Below 900 MHz and in the 3 GHz Band)	
)	

**COMMENTS OF
SYMMETRICAL NETWORKS INC.**

INTRODUCTION

SYMMETRICAL NETWORKS INC. (Symmetrical) submits these Comments in support of the Commission's NOTICE OF PROPOSED RULEMAKING, adopted May 13, 2004.

DISCUSSION

Symmetrical agrees with the Commission that permitting unlicensed devices to use vacant TV channels would further the goals and efforts of Congress and the Commission to encourage and promote efficient and effective use of the radio spectrum. We also agree with the Commission that because transmission in the TV band are subject to less propagation attenuation than transmissions in the spectrum where existing broadband unlicensed operations are permitted, could benefit wireless internet service providers (WISPs) by improving the service range of their networks. These networks could then offer significant benefits to American consumers and businesses by offering the possibility of increased competition with other providers of broadband service, including cable and digital subscriber line (DSL) broadband services in rural areas that are either un-served or under-served by other broadband providers.

FIXED/ACCESS UNLICENSED DEVICES

To serve remote rural communities, longer transmission distances must be covered, requiring higher gain, narrower beam width, antennas. Therefore, we request that Part 15.247(4)(ii) of the rules should apply to fixed point-to-point applications in the new spectrum. We believe that interference protection can be provided by the narrower antenna beam and transmitter power control (TCP).

CONCLUSION

Symmetrical supports the Commissions proposal to allow unlicensed radio transmitters to operate in the broadcast television spectrum at locations where that spectrum is not being used.

Symmetrical further requests the Commission to apply the requirements of Part 15.247(4)(ii) of the rules, to fixed point-to-point applications in the new spectrum.

Respectfully submitted,

SYMMETRICAL NETWORKS INC.

Michael Mulcay
President and CEO