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ATTORNEYS AT LAW

January 27, 2005

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:

Yesterday representatives of the WCA Above 60 GHz Committee met with officials from the Office of Engineering and Technology and the Wireless Telecommunications Bureau to discuss the above-captioned proceeding. Commission staff in attendance included Ed Thomas, Jim Schlichting, Bruce Franca, Alan Scrime, and Patrick Forster for OET; Peter Daronco, David Hu, and Michael Pollak for WTB; and Doug Lockie of GigaBeam, Mary Brown of Cisco, and the undersigned counsel for Cisco attending on behalf of the WCA. Stephen Buenzow of WTB participated by phone, as did Dave Stephenson and Eldad Perahia of Cisco, Dana Wheeler and Tom Rosa of Terabeam, Gregg Levin of Bridgewave, and Tom Cohen of the KDW Group for Loea Communications.

The discussion focused on the WCA's proposal for a flexible set of power and antenna specifications known as the "power/gain tradeoff," a proposal that enjoys the unanimous support of every interested party to this proceeding. We began by discussing the attached slides, but quickly moved to a discussion of the ways in which the power/gain tradeoff would improve the economic prospects for early and intensive deployment in these bands. There are approximately 750,000 business locations of 20 or more employees within one mile of a fiber POP. We estimate that the Commission's requirement for 50-dBi gain antennas would allow industry to address perhaps 20 or 25% of business locations, where large concentrations of users exist. However, industry would like to have the flexibility to use 43-dBi gain antennas to serve that part of the enterprise market in less dense locations – businesses in campus or office park settings, with buildings of just two or three stories. We estimate that the number of these lower density business locations that can be served by 70/80 GHz technology might be as high as 75 or 80% of the total market under the industry's proposed rule.

Participants in yesterday's discussion also acknowledged that neither the current rule nor the industry proposal is required as a matter of mathematical necessity; it is rather a question of practical judgment based on an assessment of the market. The industry, which has every incentive to pay attention to both the costs and the benefits of the competing rules, has

given its unanimous support to the "power/gain tradeoff" proposal, and we urge the Commission to adopt it.

The Commission staff who were present at our meeting showed clear interest in more quantitative economic data reflecting the practical consequences of this issue. WCA members are attempting to gather that information now, and we expect to submit those data for the record in the near future.

I am submitting a copy of this notice for the record pursuant to section 1.1206(b) of the Commission's rules. Please feel free to contact me with any questions about this submission.

Respectfully submitted,

/s/

Mark A. Grannis

Copies: Participants named above

Alternate Illustration of Power/Gain Rule

- **The subsequent slide compares the max EIRP levels from both a 0.6 deg and a 1.2 deg antenna based the power/gain rule.**
- **The 1.2 deg pattern (outlined with white line) overlays the 0.6 deg pattern (outlined with black line)**
- **The 1.2 deg pattern is completely encompassed by the 0.6 deg pattern demonstrating:**
  - **The 1.2 deg antenna always has lower EIRP than 0.6 deg**
  - **Interference caused by the 1.2 deg antenna is always less than 0.6 deg antenna**

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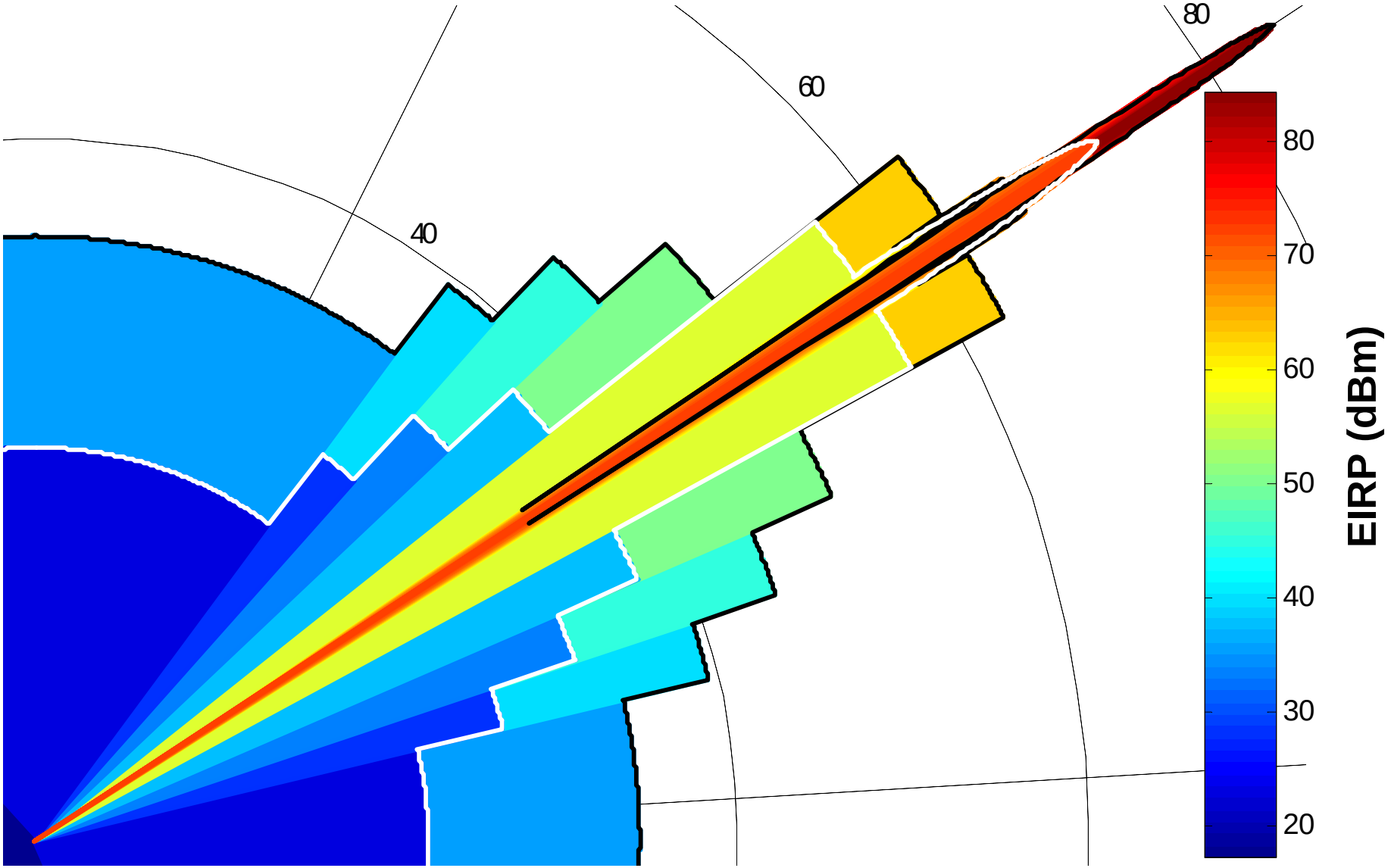
Max EIRP levels comparing 0.6 deg (black outline) w/ 1.2 deg (white outline)