

Federal Communications Commission
Washington, D.C. 20554

October 20, 2006

RE: Service Rules for the 698-746, 747-762, and 777-792 MHz Bands
FCC WT Docket No. 06-150

For a new technology to be commercially successful the following five factors would need to be met: technology, economics, application, standards, and regulatory. This letter addresses the Broadband Wireless technology and the associated supportive regulatory environment needed to affect the "personal broadband" vision.

Navini Networks is the global leader in personal broadband wireless access solution with the largest commercial deployments in the world; over 50 commercial networks in 6 continents and strategic partnerships with industry leaders. Navini is championing the Mobile WiMAX fourth generation (4G) wireless telecommunication evolution by shipping products across the full range of spectrums (2.3, 2.5, 2.6, 3.4, 3.5, 3.6 GHz).

Mobile WiMAX delivers on the vision of anytime, anywhere personal broadband availability similar to the paradigm shift of voice communications using mobile vs. landline phone service; one outcome of which was a sizable increase of productivity and economic progress in the USA. Mobile WiMAX based on the ratified IEEE 802.16e (802.16-2005) technology standard is a key technology in realizing this vision that is built from the ground up to provide broadband data rates and services at economic rates through the efficient use of the RF spectrum.

Navini's current product offering is built upon the existing premise of time-division-duplex (TDD) scheme utilizing (N=3 x 5.5 MHz) 16.5 MHz bands (as per the 2.5/2.6 GHz EBS/BRS spectrum) that are supportive of commercial deployments of affordable and ubiquitous broadband wireless services. To that end we at Navini encourage the FCC to allocate additional spectrum in the 700 MHz for Mobile WiMAX deployment that is conducive to TDD scheme. In addition, we recommend that at least 15 MHz of spectrum per service provider, preferably 30 MHz, be allocated.

In the USA, the 3.5 GHz spectrum is not available for 4G applications, the reasonable 2.5/2.6 GHz spectrum is held by a handful of operators, and the 2.3 GHz WCS band is limited to 30 MHz, fragmented, and restricted by DARS band. Making available additional bands of 16.5 MHz in the 700 MHz spectrum as described by the Access Spectrum and Pegasus Communications comments would ensure ubiquitous coverage, facilitate the adoption and deployment of the 4G wireless services, and increase competition amongst service providers. This approach will increase the USA's technological lead in 4G and the associated productivity of American workers in general, and benefit American consumers in particular.

Regards,

//signed//

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