

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Revision of the Commission’s Rules) ET Docket No. 07-113
Regarding Operation in the 57-64 GHz Band)
)

**REPLY COMMENTS OF THE WIRELESS COMMUNICATIONS ASSOCIATION
INTERNATIONAL, INC.**

The Wireless Communications Association International, Inc. (“WCA”), pursuant to Section 1.415 of the Commission’s Rules, hereby submits its reply comments in support of the Commission’s *Notice of Proposed Rulemaking* (“NPRM”) in the above-captioned proceeding.¹

WCA concurs with the contemporaneous reply comments filed in this proceeding by BridgeWave Communications, Inc. (“BridgeWave”). As pointed out in BridgeWave’s filing, the record in this matter continues to support adoption of the Commission’s proposed rule amendments for the unlicensed 57-64 GHz band (subject to the additional modifications proposed by BridgeWave), and thus the Commission should proceed expeditiously towards the issuance of a *Report and Order* that puts its proposals into effect. By doing so, the Commission will maximize the unlicensed 57-64 GHz band’s potential as a source of competitive very high-speed broadband service, and “thereby further the Commission’s objective of promoting the availability of broadband connectivity to all Americans.”²

WCA notes that the initial comments filed by other parties appear to suggest that the Commission’s proposals in the *NPRM* are a rush to judgment.³ In fact, however, the opposite

¹ See *Revision of the Commission’s Rules Regarding Operation in the 57-64 GHz Band*, Notice of Proposed Rule Making, 22 FCC Rcd 10505 (2007) [“NPRM”].

² *Id.*

³ See Comments of Cisco Systems, Inc., ET Docket No. 07-113 (filed Oct. 17, 2007); Comments of IEEE 802.18, ET Docket No. 07-113 (filed Oct. 5, 2007).

is true. WCA filed its petition for rulemaking in this matter over three years ago, and during that time all potentially interested parties had more than ample opportunity to express their concerns about any possible impact the proposed rule modifications might have on users of the unlicensed 57-64 GHz band, particularly those intending to utilize lower power, indoor consumer-based applications. Indeed, the Commission considered those concerns prior to issuing the *NPRM* and found that they were misplaced or otherwise were outweighed by the manifest public interest benefits offered by WCA's Petition.⁴ Moreover, none of the parties who filed comments on the *NPRM* have submitted any technical studies or other meaningful data which refutes the Commission's findings in the *NPRM*. The Commission therefore can and should act swiftly so users of the unlicensed 57-64 GHz band are able to deliver new very high-speed broadband services to customers who have little or no access to those services today.

WHEREFORE, for the reasons set forth above, WCA requests that the Commission adopt its proposals in the *NPRM* to amend its rules for the unlicensed 57-64 GHz band as set forth above and in WCA's prior filings in this proceeding.

Respectfully submitted,

**THE WIRELESS COMMUNICATIONS
ASSOCIATION INTERNATIONAL, INC.**

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⁴ See *NPRM*, 22 FCC Rcd at 10508-09, 10513.