

Before the  
**Federal Communications Commission**  
Washington DC 20554

In the Matter of )  
 )  
Fixed Wireless Communications Coalition, )  
Amendment of Sections 101.109 and 101.147 ) RM-11417  
of the Commission's Rules to Accommodate )  
30 MHz Channels in the 6525-6875 MHz Band )

**COMMENTS OF HARRIS STRATEX NETWORKS**

Pursuant to Section 1.405 of the Commission's Rules, Harris Stratex Networks, Inc (HSX) files these comments in support of the above-captioned Petition for Rulemaking of the Fixed Wireless Communications Coalition (FWCC).<sup>1</sup>

The FWCC requests an amendment to Sections 101.109(c) and 101.147(l) to authorize 30 MHz channels in the 6525-6875 MHz band.

Harris Stratex Networks, Inc. is the largest independent supplier of wireless transmission systems in the world. The sole focus of HSX is to provide complete wireless network solutions, which includes hardware, network management software and world-class field services. HSX supplies products and services to government agencies (including Public Safety and Homeland Security), Critical Infrastructure Industries ("CII"; including energy and utility companies), mobile and fixed telephone service providers, private network operators, transportation, and broadcast system operators across the globe. HSX wireless transmission products include point-to-point digital microwave radio systems for data networks, mobile access/backhaul networks, trunking networks and license-exempt applications, supporting new network deployments, network expansion, and capacity upgrades. Frequencies employed by HSX radios range from 2

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<sup>1</sup> See Report No. 2852, Consumer & Governmental Affairs Bureau, Reference Information Center, Petition For Rulemakings Filed (released Feb. 28, 2008).

to 38 GHz, covering regulatory and application requirements in all regions of the world. Product throughput capacities range from single T1/E1 to multiple OC-3/STM-1, enabling cost-efficient, reliable communications transport.

**Harris Stratex Networks (HSX) supports the Petition for Rulemaking made by the Fixed Wireless Communications Coalition (FWCC).**

As a major provider of microwave equipment throughout the United States, HSX is in a strong position to take part in the continuing growth in capacity requirements which are rapidly exceeding the planned capacity in individual channels of this band. Increasingly customers are running up against capacity limits posed by the current 10 MHz channels, and yet, are unable to find available spectrum in the lower 6 GHz band where the increased capacity requirements could have been accommodated with its 30 MHz channel spacing. The lower 6 GHz band also suffers from the presence of FSS Earth stations which adds to the congestion of that band. The use of channels in the 11 GHz or higher bands is not preferred for such capacity enhancement due to the different propagation conditions and potential requirements for additional intermediate sites. This is a costly solution and as a result customers are forced to apply for a waiver to be able to continue to operate in the upper 6 GHz bands after coordinating the wider channels.

**Importance of Conditional Licensing**

By permitting 30 MHz channeling in the Upper 6 GHz band, the Commission would, under its rules, permit conditional operation of the band pending licensing delays. Such conditional licensing would not be available under waiver applications. As mentioned in the FWCC petition, fixed service facilities must often be installed on short notice to meet urgent needs, which makes conditional licensing an important asset to the industry and its customers.

Fixed service bands carry critical services such as public safety communications (including police and fire vehicle dispatch), coordinating the movement of railroad trains, controlling natural gas and oil pipelines, regulating the electric grid, and backhauling wireless telephone traffic. In addition, they carry large amounts of business data. Conditional licensing allows providers to meet public safety, infrastructure, and commercial needs with minimum delay.

### **Proposed Channel Plan**

HSX also notes and agrees with the proposed new channel centers which conform, to a maximum extent, with existing 10 MHz channel centers and retains current channels for emergency restoration.

### **Requirement to Attempt to Coordinate Lower 6 GHz**

HSX customers would prefer to be able to expand their existing 10 MHz channels to use the new 30 MHz channels without requiring the seeking of available channels in the lower bands. However, HSX recognizes that the upper 6 GHz band was primarily intended for the low capacity user and does not seek to alter that situation.

### **CONCLUSION**

For the foregoing reasons, **HSX** supports the Petition for Rulemaking of the FWCC urges the Commission to urgently approve its Petition.

Respectfully submitted,



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