

“Cielo Networks, inc. strongly supports the Commission’s NPRM WT Docket No. 09-114 RM-11417 regarding allocation of additional conditionally licensed channels in the 23 GHz band (para. 22 & 24) and the authorization of wider channels up to 30 MHz in the 6525-6875 band (para. 15) as being in the broadest possible public interest. We further see little prospect for speculative licensing and as such do not concur with API’s concerns (para. 13) and do concur with FWCC’s and AT&Ts’ comments (para. 14). Further, per the request regarding alternative possible band plans for the 6 GHz upper band (para. 19), we ask the FCC consider the possibility of authorizing a limited number of channels with bandwidths of 40 MHz or higher in order to support the strongly growing demand for long distance microwave links with capacities of 200 Mbps and higher.

The following specific comments are submitted:

- 23 GHz NPRM Comments:
  - The authorization of an additional 2 channels in the 23 GHz band will well serve the public interest by facilitating the more expeditious deployment of short distance link which are often required for circuit restoration services for critical public safety communications, and rapid service initiation for a wide variety of public enterprise applications, such as education networks, as well as commercial service provider requirements.
- 6 GHz NPRM Comments:
  - As the deployment of public and private broadband services grows, particularly in rural environments where optical or electrical (non-RF) circuits are unavailable, there is clearly a need for additional channels with bandwidths greater than 10 MHz. We anticipate this demand to accelerate substantially in the next several years given the federal government’s new encouragement and financial support for the provision of more pervasive true broadband access in the currently underserved and unserved rural areas of U.S. through such programs as USAC E-rate for education and the various existing and new programs of the USDA/RUS, NTIA, etc.
  - Given the significant ongoing growth in broadband capacity demand for both public and private networks, including the rural broadband programs mentioned above, and the existing modulation technology limitations on achievable bandwidth per unit spectrum unit, we would encourage the commission to investigate whether some number of channels with a bandwidth greater than 30 MHz could be made available as well. The authorization of set of 6 GHz channels with 40 or even 50 MHz of bandwidth would support microwave circuits of 200 – 250 Mbs using a single duplex channel pairing. Requirements for long distance circuits requiring 6 GHz band utilization and such capacities or even higher are already common today and are very likely to grow significantly. In a high percentage of these cases there is either no alternative whatsoever, or the alternative (long distance fiber cable construction) is both prohibitively expensive and subject to long delay in availability due to extensive permitting and construction lead times. Having at least some number of channels available to support such capacities, or even higher capacities using dual channel (2+0) systems may well be essential to the success of many of the government’s current rural broadband initiatives.
  - As with the current lower 6 GHz band, we do not anticipate that authorizing 30 MHz channels in the upper 6 GHz band will lead to any form of speculative licensing. Given the competitive economic pressures faced by the commercial service providers or private users of all Part 101 bands, it is highly unlikely that license applications would be filed for frequencies & locations if there were not viable commercial or private demand to support the expenditures inherent in licensing process. The existing channel payload capacity requirements further insure that any newly authorized 30 MHz channels in the 6 GHz band will be put to spectrally efficient use.