

Before the
Federal Communications Commission
Washington DC 20554

In the Matter of)	
)	
Wireless Telecommunications Bureau Seeks)	WT Docket No. 09-106
Comment on Request of Alcatel-Lucent, <i>et al.</i>)	
for Interpretation of 47 C.F.R. § 101.141(a)(3))	
to Permit the Use of Adaptive Modulation Systems)	

**COMMENTS OF THE
FIXED WIRELESS COMMUNICATIONS COALITION**

The Fixed Wireless Communications Coalition (“FWCC”)¹ files these comments in support of the above-captioned request to permit the use of adaptive modulation in fixed microwave systems.² The FWCC is one of the signatories to the original request.

In the eleven weeks since the filing, members of the FWCC, and their employees and representatives, have participated in numerous formal and informal discussions of the adaptive modulation issue, including platform debates at major industry forums. We remain convinced that the use of adaptive modulation, including brief periods of operation below the values

¹ The FWCC is a coalition of companies, associations, and individuals interested in the fixed service -- *i.e.*, in terrestrial fixed microwave communications. Our membership includes manufacturers of microwave equipment, fixed microwave engineering firms, licensees of terrestrial fixed microwave systems and their associations, and communications service providers and their associations. The membership also includes railroads, public utilities, petroleum and pipeline entities, public safety agencies, cable TV and private cable providers, backhaul providers, and/or their respective associations, communications carriers, and telecommunications attorneys and engineers. Our members build, install, and use both licensed and unlicensed point-to-point, point-to-multipoint, and other fixed wireless systems, in frequency bands from 900 MHz to 95 GHz. For more information, see www.fwcc.us.

² See *Wireless Telecommunications Bureau Seeks Comment on Request of Alcatel-Lucent, et al. for Interpretation of 47 C.F.R. § 101.141(a)(3) To Permit the Use of Adaptive Modulation Systems*, WT Docket No. 09-106, DA 09-1427 (released June 25, 2009).

specified in Section 101.141(a)(3), while still meeting the requirements of that section on an average basis, can significantly improve the performance and reliability of fixed microwave systems.

CONCLUSION

For the foregoing reasons, the FWCC strongly supports a prompt grant of the requested rule interpretation to permit the use of adaptive modulation as set out in the original request.

Respectfully submitted,

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