

Before the
Federal Communications Commission
Washington DC 20554

In the Matter of)
)
Fixed Wireless Communications Coalition,)
Petition to Amend Part 101 of the Commission's) RM-11610
Rules for Automated Government Frequency)
Coordination and Conditional Licensing in the)
23 GHz Fixed Service Band)

**Comments of the
Fixed Wireless Communications Coalition**

The Fixed Wireless Communications Coalition (FWCC)¹ files these comments in the above-captioned proceeding.²

The FWCC is the original proponent of this rulemaking. Our rulemaking petition noted the expected increase in demand for backhaul capacity to support mobile broadband deployment, and also the suitability of the 23 GHz band for wireless backhaul over relatively short distances, particularly in built-up areas where demand density is high and cell towers tend to be close together.

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 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.

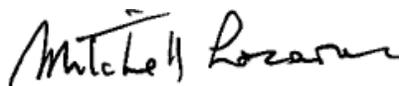
² Consumer & Governmental Affairs Bureau Reference Information Center, Petition for Rulemakings Filed, Report No. 2915 (released Sept. 10, 2010).

The major downside to the 23 GHz band is the limitation of conditional authorization to six frequency pairs, as the rest of the band needs coordination with Federal users.³ The importance of conditional authorization is evidenced by users' overwhelming preference for those six pairs.⁴

The FWCC suggested a method for real-time Federal coordination, based on technology now in use for the 70/80/90 GHz bands, that would allow conditional authorization on all frequencies. Adoption of this method would help to provide much-needed backhaul spectrum without disadvantaging any parties.

We urge the Commission to move quickly to a Notice of Proposed Rulemaking.

Respectfully submitted,



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³ See 47 C.F.R. § 101.31(b)(vii). Conditional authorization permits a license applicant to begin operating a link as soon as the application is filed, if the link has been frequency coordinated and certain other conditions are met. The applicant agrees to cease operation immediately if the application is dismissed or denied.

⁴ See Petition for Rulemaking of the Fixed Wireless Communications Coalition in RM-11610 at 7-8 (filed July 26, 2010).

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