

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Amendment of Part 101 of the Commission’s	)	
Rules to Facilitate the Use of Microwave for	)	
Wireless Backhaul and Other Uses and to	)	
Provide Additional Flexibility to Broadcast	)	
Auxiliary Service and Operational Fixed	)	
Microwave Licensees	)	WT Docket No. 10-153
	)	
Request for Interpretation of Section	)	WT Docket No. 09-106
101.141(a)(3) of the Commission’s Rules Filed	)	
by Alcatel-Lucent, Inc., <i>et al.</i>	)	WT Docket No. 07-121
	)	
Petition for Declaratory Ruling Filed by	)	
Wireless Strategies, Inc.	)	
	)	
Request for Temporary Waiver of Section	)	
101.141(a)(3) of the Commission’s Rules Filed	)	
by Fixed Wireless Communications Coalition	)	

**COMMENTS OF THE RURAL TELECOMMUNICATIONS GROUP, INC.**

The Rural Telecommunications Group, Inc. (“RTG”)<sup>1</sup>, by its attorneys, submits these comments in response to the Federal Communications Commission’s (“FCC” or “Commission”) Notice of Proposed Rulemaking and Notice of Inquiry (“NPRM”) released August 5, 2010 in the above-captioned proceeding. RTG opposes the proposal to allow Fixed Service (“FS”) licensees to operate “auxiliary stations.” Such a substantial change in the Commission’s fixed microwave rules will result in increased interference to existing licensees and will harm rural wireless carriers and their customers.

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<sup>1</sup> Headquartered in Washington, DC, the Rural Telecommunications Group, Inc. is a trade association representing rural wireless carriers who serve less than 100,000 subscribers. RTG's members have joined together to speed delivery of new, efficient and innovative telecommunications technologies to remote and underserved communities.

The NPRM recognizes that there are potential problems associated with the proposal, stating that “[o]ur main concerns are avoiding interference to existing operations in the bands, maintaining the availability and integrity of existing systems, and avoiding a situation where spectrum becomes unavailable to FS applicants and other users that share spectrum with FS.” These concerns will be fully realized if the auxiliary station proposal is adopted.

RTG members use FS facilities for cellular system backhaul. Such facilities are critical to the ability of rural wireless carriers to provide service in their rural areas. Interference to such facilities, which will result from adoption of the proposal, will severely undermine the efficiency of these carriers’ rural wireless operations.

While existing Part 101 rules promote spectrum efficiency per the Commission’s intent, the auxiliary proposal will create a disincentive for efficient operations. In order to maximize the area served by a group of auxiliary stations, the licensee will be incented to maximize the power transmitted from the primary link even if such power is not necessary for its operation.

The deployment of auxiliary stations will also promote the use of time division duplexing operation into bands that have historically used frequency division duplexing. This will dramatically increase the risk of interference in these bands.

In addition to the increased risk of interference, the proposal will limit the ability of entities to access spectrum in these bands. For rural wireless carriers like RTG members, as well as the critical infrastructure, public safety users and government users of this spectrum, such a result is not in the public interest.

For the foregoing reasons, RTG respectfully requests that the Commission not adopt the auxiliary station proposal.

Respectfully submitted,

**RURAL TELECOMMUNICATIONS GROUP, INC.**

*/s/ Caressa D. Bennet*

By: \_\_\_\_\_

Caressa D. Bennet  
Michael R. Bennet  
Bennet & Bennet, PLLC  
4350 East West Highway, Suite 201  
Bethesda, MD 20814  
Phone: (202) 371-1500

Its Attorneys

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