

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)	

**Reply Comments of the
Fixed Wireless Communications Coalition**

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

The FWCC is the original proponent of this rulemaking. In order to help meet the growing need for wireless backhaul to support mobile broadband, we asked the Commission to modify its rules for the 23 GHz band to allow conditional authorization on additional channel pairs and the use of EIRP greater than 55 dBm. To protect federal government operations in this

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).

band, the proposal includes an up-front coordination process similar to that currently used in the 70/80/90 GHz bands.

No opposition has been filed. Two comments express full support. Both observe that ensuring the availability of microwave spectrum would further the National Broadband Plan goal of greater flexibility and cost-effectiveness in deploying wireless backhaul.³

Comsearch points to the various factors that make the 23 GHz band particularly suitable for backhaul.⁴ Furthermore, as an FCC-appointed database manager for the 70/80/90 GHz service, Comsearch confirms that the current coordination procedures can be easily modified to accommodate the 23 GHz band.⁵

T-Mobile states that microwave backhaul, particularly in rural areas, is increasingly critical to the deployment of wireless broadband and that the proposed rule changes would provide flexibility to support that deployment.⁶ T-mobile also observes that the proposed up-front coordination plan would enable prompt conditional authority to access 23 GHz channels without jeopardizing federal use.⁷ Finally, T-Mobile states that the use of an EIRP greater than 55 dBm would provide T-Mobile and other carriers with the wireless backhaul options needed to deploy 4G services—again, particularly in rural areas.⁸

³ Comments of Comsearch at 4 (filed Oct. 12, 2010); Comments of T-Mobile USA, Inc. at 2-3 (filed Oct. 12, 2010).

⁴ Comments of Comsearch at 2.

⁵ “The NTIA already has the necessary procedures in place to accommodate secure data transfer, perform the necessary analyses (albeit at higher frequencies), and issue the appropriate “yellow light” or “green light.” *Id.* at 3.

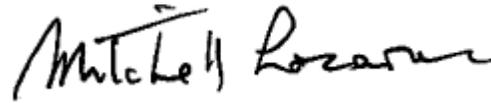
⁶ Comments of T-Mobile USA, Inc. at 2-3.

⁷ *Id.* at 4.

⁸ *Id.* at 4-5.

In view of the lack of opposition and the clear benefits of this proposal, we urge the Commission to move quickly to a Notice of Proposed Rulemaking.

Respectfully submitted,

A handwritten signature in black ink that reads "Mitchell Lazarus". The signature is written in a cursive style with a prominent initial "M".

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