

**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 101.141(a)(3) of the Commission’s Rules Filed by Alcatel- Lucent, Inc., <i>et al.</i>)	WT Docket No. 09-106
)	
)	
Petition for Declaratory Ruling Filed by Wireless Strategies, Inc.)	WT Docket No. 07-121
)	
)	
Request for Temporary Waiver of Section 101.141(a)(3) of the Commission’s Rules Filed by Fixed Wireless Communications Coalition)	

REPLY COMMENTS OF SPRINT NEXTEL CORPORATION

Sprint Nextel Corporation (“Sprint”) hereby respectfully submits its reply to comments filed on the Notice of Proposed Rulemaking and Notice of Inquiry in the above captioned proceeding.¹ In this NPRM/NOI, the Federal Communications Commission (“Commission”) received several comments that Sprint fully supports. Sprint sees significant opportunities in the proposals discussed below for removing regulatory barriers to the use of spectrum for wireless backhaul and other point-to-point and point-to-multipoint communications.

¹ *Notice of Proposed Rulemaking and Notice of Inquiry*, WT Docket Nos. 10-153, 09-106, 07-121; FCC 10-146 (August 5, 2010) (“NPRM/NOI”).

Shared use of 7125-8500 MHz

Sprint supports the proposals by Comsearch and Motorola to commence a rulemaking with NTIA to allow for the commercial sharing of federal government fixed spectrum at 7125-8500 MHz, based on the Petition for Rulemaking filed by the Fixed Wireless Communications Coalition (RM-11605).² Because this band is already used for fixed point-to-point links, coordination of new commercial point-to-point links should be straightforward and the potential for interference should be minimal. In addition, the amount of additional spectrum available for wireless backhaul could be greatly increased as compared to other bands that might have multiple uses. For example, while Sprint supports the FCC proposal to permit microwave backhaul operations into frequency bands currently allocated solely to CARS and BAS operations, expanded fixed point-to-point use of those bands might be limited by incumbent mobile and temporary fixed BAS operations.³ Thus, commercial sharing of 7125-8500 MHz would better help meet the growing needs for point-to-point microwave operations.

Sprint agrees with Comsearch that commercial fixed microwave services would be compatible with the existing government uses of this band; sharing could be handled on a co-primary basis using the proposed first-come first-served frequency coordination approach.⁴ Sprint agrees with Motorola, Inc. that there is a need for wireless backhaul below 10 GHz and permitting wireless backhaul in the 6875-7125 MHz will not adequately address wireless backhaul spectrum needs. The proposed sharing is feasible

² *Comments of Comsearch*, WT Docket Nos. 10-153, 09-106, 07-121; FCC 10-146 (*October 25, 2010*), page 37, and *Comments of Motorola, Inc.*, WT Docket Nos. 10-153, 09-106, 07-121; FCC 10-146 (*October 25, 2010*), page 6.

³ See, for example, *Comments of Society of Broadcast Engineers, Incorporated*, WT Docket Nos. 10-153, 09-106, 07-121; FCC 10-146 (*October 25, 2010*), page 2 *et seq.*

⁴ *Comments of Comsearch, supra.*, page 37.

with deference to the federal government users of the band, as evidenced by the sharing of spectrum for federal/non-federal purposes in the 23 GHz band.⁵

Use of TV Whitespace for backhaul

Sprint supports the opening of vacant TV Whitespace for fixed point-to-point operations in rural or tribal areas, as Sprint has expressed previously in ET Dockets 04-186 and 02-380.⁶ This change would support the needs outlined by FiberTower for more frequencies available for long links below 4 GHz.⁷ Sprint Nextel supports this concept because of the opportunities this design would allow for operation of long-haul microwave links in rural areas. Similar designs today by BAS licensees are used in these bands to reach at least 50 miles and even up to 100 miles in some locations, and the light weight of this equipment compared to licensed 6 GHz equipment would allow for its effective deployment at many additional locations. This would also allow backhaul costs to be reduced by almost 80-90% in rural areas and would be helpful for finding low-cost methods of providing backhaul for longer distances.⁸

Streamlined Collocation Review Process

Finally, Sprint supports the proposal by PCIA to encourage the Commission to adopt rules to streamline the collocation review process and allow carriers to efficiently utilize existing infrastructure in the deployment of wireless services, including

⁵ *Comments of Motorola, Inc. supra.*, page 6.

⁶ *See, for example, Notice of Ex Parte Presentations*, ET Docket Nos. 04-186 and 02-380, September 16, 2010, filed by FiberTower Corporation, Wireless Communications Association International, Sprint Nextel Corporation, and Rural Telecommunications Group, Inc.

⁷ *Comments of FiberTower Corporation*, WT Docket Nos. 10-153, 09-106, 07-121; FCC 10-146 (October 25, 2010), page 6.

⁸ *Comments of FiberTower Corporation, supra.*, page 9.

microwave wireless backhaul services.⁹ Sprint also supports FiberTower's recommendation that the Commission provide clearer guidance to state and local officials, building landlords, homeowner's associations, and the public regarding the applicability of the Over-the-Air Reception Devices ("OTARD") regulations to fixed microwave dishes smaller than one meter in diameter.¹⁰ Some of the greatest challenges facing point-to-point microwave users are the restrictions placed on antenna installations by landlords and other site owners, and securing better understanding of OTARD procedures as it relates to microwave equipment would allow for greater deployment and use of wireless backhaul on existing infrastructure with ever smaller microwave equipment. These existing regulations provide effective opportunities to speed the deployment of microwave backhaul and Sprint agrees that a clear, simple fact sheet from the FCC explaining the OTARD rule would speed efficient mobile broadband deployments.¹¹

⁹ *Comments of PCIA – The Wireless Infrastructure Association*, WT Docket Nos. 10-153, 09-106, 07-121; FCC 10-146 (*October 25, 2010*), page 2.

¹⁰ *Comments of FiberTower Corporation, supra.*, page 10.

¹¹ *Comments of FiberTower Corporation, supra.*, page 12.

In conclusion, Sprint believes that these additional proposals would increase the efficient use of this spectrum for microwave backhaul along with Sprint's previous recommendations for new frequency bands for microwave, adaptive modulation and revised efficiency standards that permit smaller antennas. Sprint again emphasizes, however, that – regardless of any steps taken in this NPRM – the FCC must address the broader issue of special access reform if it wishes to achieve rapid expansion of fully competitive wireless broadband services.

Respectfully submitted,

Sprint Nextel Corporation
900 7th Street, NW – Suite 700
Washington, DC 20001

/s/ Lawrence R. Krevor
Lawrence R. Krevor
Vice President – Spectrum
(703) 433-4140

Richard B. Engelman
Director – Spectrum Resources
(703) 433-8124

Kyle B. Entz
Manager – Regulatory Affairs
(703) 592-2968

Dated: November 22, 2010