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March 21, 2011

VIA HAND DELIVERY

Julius P. Knapp
Chief
Office of Engineering and Technology
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

*Re: Optimization of the Unlicensed 60 GHz Band
(ET Docket No. 07-113)*

Dear Mr. Knapp:

On behalf of the Wireless Communications Association International Inc. ("WCAI"), I am writing to respectfully request expedited action on the Commission's *Notice of Proposed Rulemaking* ("*NPRM*") in the above referenced proceeding.¹

WCAI filed the Petition for Rulemaking that launched this proceeding in 2004.² At that time, WCAI's primary objective was to obtain modifications of the Commission's rules that would permit radios operating in the unlicensed 60 GHz band to deliver outdoor links over longer distances without causing harmful interference, optimizing the spectrum as a vehicle for delivery of broadband services to consumers (particularly business users). As reflected, however, in subsequent filings submitted by BridgeWave Communications Inc. ("BridgeWave"), the need for action on WCAI's proposals (which the Commission proposes to adopt virtually *verbatim* in the *NPRM*) has taken on a new urgency due to the recent interest in using the unlicensed 60 GHz band to provide gigabit-capacity backhaul for 4G deployments.³ Adoption of the proposals in the *NPRM* thus would advance

¹ See Revision of the Commission's Rules Regarding Operation in the 57-64 GHz Band, *Notice of Proposed Rulemaking*, 22 FCC Rcd 10505 (2007).

² See Wireless Communications Ass'n Int'l Petition for Rulemaking, RM-11104 (filed Sept. 30, 2004).

³ See, e.g., *Ex Parte* Letter from BridgeWave Communications Inc., ET Docket No. 07-113, Attachment 1 at 2 (filed April 9, 2010) ("The wireless broadband industry is experiencing an increased demand in densely populated areas for base stations serving 4G mobile devices such as WiMAX and LTE. These base stations are nicknamed "pico cells." The distance between a pico cell and a macro cell, or between two adjacent pico cells, is normally about 300-500 meters. Traffic to and from mobile devices needs to be backhauled to the next pico cell or macro cell. Since the expected 4G traffic capacity per pico cell site is between 50 – 150 Mbps (depending on the number of sectors in use), and since pico cells might be daisy chained for backhaul to the macro cell, the required backhaul capacity is roughly estimated to vary between 50 – 500 Mbps. The

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the Commission's goal of promoting near-term, cost-effective backhaul solutions that provide enough bandwidth to accommodate the accelerating demand for 4G services.⁴

WCAI's commitment to the development of 4G is a matter of record, as is its support for the Commission's efforts to identify new backhaul solutions for 4G and other broadband services.⁵ In that spirit, WCAI urges the Commission to adopt the rule modifications proposed in the *NPRM* and issue a *Report and Order* to that effect, so that 4G service providers, their backhaul providers and consumers can reap the benefits therefrom as soon as possible.

Very truly yours,

/s/ Fred B. Campbell, Jr.

Fred B. Campbell, Jr.
President

cc: Karen Ansari

combination of high capacity and the short distance between the cell sites makes the 60 GHz band an excellent backhaul solution for pico cells. While other wireless backhaul options might be used, including sharing the 4G spectrum to transmit backhaul traffic ("in-band backhaul"), a low-cost 60 GHz radio would provide the multiple advantages of spectral efficiency (since 4G spectrum would not have to be used for backhaul), higher capacity and a lower latency.").

⁴ See Comments of Wireless Communications Ass'n Int'l, WT Docket No. 10-153, at 2 (filed Oct. 25, 2010) ("The transition to next generation mobile wireless broadband technologies with bandwidth capabilities per base station in the range of 100 to 300 Mbps is rapidly rendering today's backhaul solutions, such as T1 lines, obsolete. Without adequate backhaul and middle mile capacity, the throughput otherwise available on 4G networks will not be realized.") (footnote omitted).

⁵ See, e.g., Comments of Wireless Communications Ass'n Int'l, GN Docket No. 11-16, at 5-6 (filed March 2, 2011).