

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

In the Matter of)
)
)
Amendment of Part 101 of the Commission's Rules to) WT Docket 10-153
Facilitate the Use of Microwave for Wireless Backhaul)
and Other Uses and to Provide Additional Flexibility to)
Broadcast Auxiliary Service and Operational Fixed)
Microwave Licenses.)

EX PARTE REPLY COMMENTS OF GLOBAL SPECTRUM ADVISORS LLC

Global Spectrum Advisors LLC ("GSA") submits these reply comments in the Federal Communications Commission's ("Commission") above-captioned proceeding, in response to the Further Notice of Proposed Rule Making released by the Commission on August 9, 2011.

Small Antennas

GSA is in the business of bringing our clients innovative technologies and methodologies that will lower the cost of providing broadband services by increasing the effective use of spectrum.

Reducing the size of allowed antennas will without question increase the effective use of spectrum by lowering costs. However, as recognized by the Commission¹, "...smaller antennas have increased potential to cause [harmful] interference..." Therefore, in order not to decrease the effective use of spectrum by the use of smaller antennas, such use must be accompanied by a

¹ FNPRM 10-153, Para. 71.

regimen that prevents any increase in harmful interference above that of compliant Category A antennas.

Therefore, GSA supports WSI's proposed minor revisions to Section 101.115(f) of the Rules as the proposed regimen will assure that "non-compliant" antennas will not cause harmful interference or block new applicant paths.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'DM Natal', with a stylized flourish extending to the right.

Douglas M. Natal, President

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