

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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|--|---|----------------------|
| In the Matter of:                            | ) |                      |
|  | ) |                      |
|  | ) |                      |
| Amendment of Part 101 of the Commission's    | ) | WT Docket No. 10-153 |
| 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                          | ) |                      |
|  | ) |                      |
| Petition for Rulemaking filed by Fixed       | ) | RM-11602             |
| Wireless Communications Coalition to         | ) |                      |
| Amend Part 101 of the Commission's Rules     | ) |                      |
| to Authorize 60 and                          | ) |                      |
| 80 MHz Channels in Certain Bands for         | ) |                      |
| Broadband Communications                     | ) |                      |

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**REPLY TO OPPOSITION OF  
CAMBIUM NETWORKS**

Cambium Networks, LTD<sup>1</sup> (“Cambium”) hereby files the following Reply to the Opposition of the National Association of Broadcasters and the Society of Broadcast Engineers, Inc.<sup>2</sup> (collectively, “broadcasters”) to the Petition for Partial Reconsideration of Motorola Solutions, Inc. Cambium urges the Commission to reject the broadcasters’ Opposition as it

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<sup>1</sup> As indicated in the Petition for Partial Reconsideration of Motorola Solutions, Inc., on August 23, 2011, Motorola Solutions announced the sale of its Canopy point-to-multipoint and Orthagon point-to-point wireless broadband business units to Vector Capital. On November 2, 2011, Cambium Networks announced its separation from Motorola Solutions and its beginning as an independent provider of wireless broadband products, services, and solutions. As explained in the Petition for Partial Reconsideration of Motorola Solutions, Inc., the issues raised therein were specifically the concern of these businesses and future participation in this proceeding on the issues will be conducted by Cambium. *See* Petition for Partial Reconsideration of Motorola Solutions, Inc. at n.1, WT Docket No. 10-153, RM-11602 (filed Oct. 27, 2011) (“Petition”).

<sup>2</sup> *See* Opposition of the National Association of Broadcasters and the Society of Broadcast Engineers, Inc., WT Docket No. 10-153 (filed Dec. 16, 2011) (“Opposition”).

raises no new arguments not already addressed by the Petition and simply replicates the same analysis that Cambium is asking the Commission to reconsider.<sup>3</sup>

In the Petition, Motorola Solutions requested reconsideration of the Commission's decision not to allow fixed services ("FS") operations on channel bandwidths of up to 50 megahertz in the 6875-7125 MHz ("7 GHz") band.<sup>4</sup> Motorola Solutions asserted that allowing such operations would better promote the Commission's goal of "enabl[ing] these spectrum bands to be used more intensively for wireless backhaul, public safety, and other critical uses supported by microwave without limiting their use for BAS or CARS."<sup>5</sup> As Motorola Solutions explained, the Commission failed to adequately balance these interests in crafting its 7 GHz rules by unnecessarily restricting 7 GHz FS operations from using 50 megahertz channel widths when there is no evidence that this would impede robust use of the frequencies by other FS, BAS, or CARS licensees.

The broadcasters assert in their Opposition that allowing channel widths of greater than 25 MHz would limit the opportunities for new BAS electronic news gathering ("ENG") operations;<sup>6</sup> however, as Motorola Solutions explained in its Petition, this contradiction is refuted by the text of the *Report and Order*. As an initial matter, the broadcasters' fundamental premise is flawed: FS use in the 7 GHz band is highly unlikely to interfere with new BAS or CARS uses because, as the Commission notes in the *Report and Order*, "these services have not

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<sup>3</sup> 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, RM-11602, *Report and Order, Further Notice of Proposed Rulemaking, and Memorandum Opinion and Order*, 26 FCC Rcd 11614 (2011) ("*Report and Order*").

<sup>4</sup> Petition at 2.

<sup>5</sup> *Report and Order*, 26 FCC Rcd at 11630 ¶ 33.

<sup>6</sup> See Opposition at 4.

been expanding geographically in recent years.”<sup>7</sup> In fact, the Commission notes that “[o]nly one new BAS TV pickup license has been granted in the 7 GHz and 13 GHz bands in the past two years.”<sup>8</sup> Thus, the broadcasters’ concerns that there are sufficient channels available for future expansion in BAS is overstated.

Notwithstanding this limited growth cycle, the Commission took steps in the *Report and Order* to provide sufficient protection and capacity for BAS operations in the 7 GHz and 13 GHz bands. For example, the Commission imposed coordination requirements on FS users, prohibited the location of new FS operations in the service areas of co-channel TV pickups, and reserved nationwide two 25-megahertz channels each in the 7 GHz and 13 GHz bands.<sup>9</sup> As the Commission explained in the *Report and Order*, these steps are designed to fully protect BAS and CARS operations.<sup>10</sup> The Commission did not mention the protection of BAS as one of the reasons it adopted the 25 MHz bandwidth limit. As the broadcasters acknowledge in their Opposition, the Commission implied that the 25 MHz channel width was motivated by a desire to ensure that sufficient spectrum would remain available for *new fixed services*.<sup>11</sup>

The broadcasters are correct to point out that the Commission concluded that the 25 MHz channel width limit was necessary as a response to a perceived scarcity of spectrum in the 7 GHz band,<sup>12</sup> however, as explained in the Petition, this argument falls short in supporting their

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<sup>7</sup> *Report and Order*, 26 FCC Rcd at 11629 ¶ 32.

<sup>8</sup> *Id.*

<sup>9</sup> *Id.*, 26 FCC Rcd at 11627, ¶ 28.

<sup>10</sup> *Id.*, 26 FCC Rcd at 11629, ¶ 32.

<sup>11</sup> See Opposition at 4-5 (arguing that the Commission rejected alternative channelization plans because they would limit “the number of available channels for fixed operations in a given market.”).

<sup>12</sup> See *Report and Order*, 26 FCC Rcd at 11628, ¶ 30.

opposition. Because the 50 megahertz channels contemplated by Cambium would be made from concatenated 25 megahertz channels, they would be consistent with the pre-existing channelization plan and would not result in “uneven, unnecessary overlap” as the broadcasters mistakenly assert. The Commission recognized as much in the context of the 13 GHz band, when it stated that “[s]ince the 50 megahertz channels will be created from two 25 megahertz channels, we do not see any inefficiency that would result from 50 megahertz channels.”<sup>13</sup> What is true in the 13 GHz band is equally true in the 7 GHz band. Instead of arbitrarily restricting the flexibility of the newly authorized fixed services in this band, the Commission should rely upon its coordination and licensing rules and the market to determine how to put this spectrum best to use to facilitate deployment of wireless broadband services.

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For the reasons set forth above, Cambium respectfully requests that the Commission reject the broadcasters’ Opposition and promptly issue an Order on Reconsideration enabling the deployment of 50 MHz channel widths by FS operations in the 7 GHz band.

Respectfully Submitted,

/s/ Clem Fisher

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<sup>13</sup>

*Id.*

Certificate of Service

I, Pamela Conley, hereby certify that on this 27<sup>th</sup> day of December 2011, a copy of the **REPLY TO OPPOSITION OF CAMBIUM NETWORKS** is being sent via first class mail, postage paid, to the following.

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/s/ Pamela Conley  
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