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UNITED STATES DEPARTMENT OF COMMERCE
National Telecommunications and
Information Administration
Washington, D.C. 20230

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

SEP 12 2012 FILED/ACCEPTED
SEP 13 2012
Federal Communications Commission
Office of the Secretary

RE: *Amendment of Part 27 of the Commission's Rules to Govern the Operation of Wireless Communications Services in the 2.3 GHz Band, WT Docket No. 07-293, Establishment of Rules and Policies for the Digital Audio Radio Satellite Service in the 2310-2360 MHz Frequency Band, IB Docket No. 95-91*

Dear Mr. Knapp:

On May 20, 2010, the Federal Communications Commission (FCC) adopted rules for the Wireless Communications Service (WCS).¹ In order to protect federal operations in adjacent bands, the National Telecommunications and Information Administration (NTIA) staff worked with the FCC to develop these rules. The rules in Section 27.73 of Title 47 of the Code of Federal Regulations (47 C.F.R. § 27.73) require: i) WCS licensees in the band 2345-2360 MHz to coordinate the deployment of base stations with aeronautical mobile telemetry (AMT) facilities in the band 2360-2395 MHz; and ii) WCS licensees in the band 2305-2320 MHz to coordinate the deployment of base stations with the National Aeronautics and Space Administration (NASA) within 145 kilometers of the Goldstone, California earth station site operating below 2300 MHz.² While the rules only address coordination with "base stations," the FCC record and our work with the FCC staff reflect the intent that these rules would also apply to WCS fixed stations.³ Wherever the rules speak to "base stations," the FCC should amend the rules to include "fixed stations." I understand that the FCC will update the WCS rules shortly. In this update, I request modifications to Section 27.73 to include coordination for fixed as well as base stations.

If you have any questions please feel free to contact Mr. Edward M. Davison (202-482-5526; edavison@ntia.doc.gov) of my staff.

Sincerely,

A handwritten signature in black ink, appearing to read "Karl B. Nebbia".

Karl B. Nebbia
Associate Administrator
Office of Spectrum Management

¹ See Amendment of Part 27 of the Commission's Rules to Govern the Operation of Wireless Communications Services in the 2.3 GHz Band, WT Docket No. 07-293, *Report and Order (WCS Report and Order)*, Establishment of Rules and Policies for the Digital Audio Radio Satellite Service in the 2310-2360 MHz Frequency Band, IB Docket No. 95-91, *Second Report and Order*, FCC 10-82 (rel. May 20, 2010).

² WCS licensees must take all practicable steps necessary to minimize the risk of harmful interference to AMT facilities and the NASA Goldstone earth station.

³ For coordination with AMT facilities, there is no difference between a base and fixed station.

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