

VIA ELECTRONIC FILING

**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 (WT Docket No. 10-153).)

**EX PARTE FILING OF WIRELESS STRATEGIES INC.
REGARDING THE SECOND FURTHER NOTICE OF PROPOSED RULE MAKING
AND SECOND NOTICE OF ENQUIRY WT DOCKET 10-153**

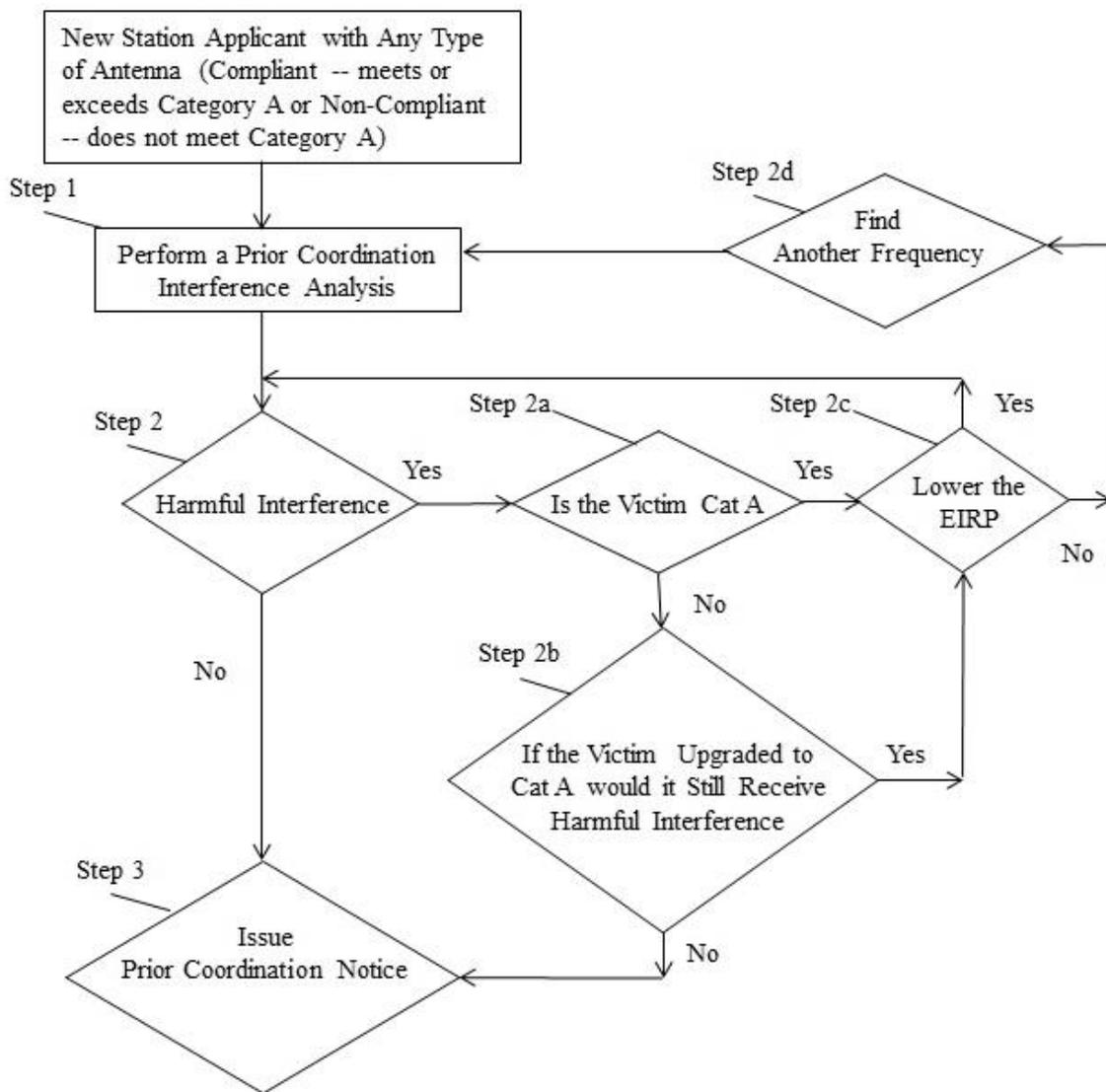
Wireless Strategies Inc. ("WSI") hereby respectfully submits this revised version of WSI's January 28, 2013 ex parte filing to include additional detail in the Prior Coordination process (see Figure 2 and explanatory text) and adding in the footnote a time limit for authorized stations using Category B antennas to comply with the antenna upgrade requirements of Rule 101.115(c).

A review of the Rules using the decision tree flow diagrams shows that non-compliant antennas with any antenna pattern and size can be safely used under existing Rules 101.103 and 101.115.

I. Review of Existing Rules

A walk-through of Figure 1 is given below.

Figure 1: Initial Prior Coordination Successful/Unsuccessful



Step 1.

The new applicant, with any type of antenna, performs a prior coordination interference analysis in accordance with Rule 101.103.

Step 2.

If the prior coordination interference analysis showed no interference issues, the applicant would proceed to Step 3 and issue a Prior Coordination Notice (PCN).

If the prior coordination interference analysis showed there was harmful interference, the applicant would proceed to Step 2a.

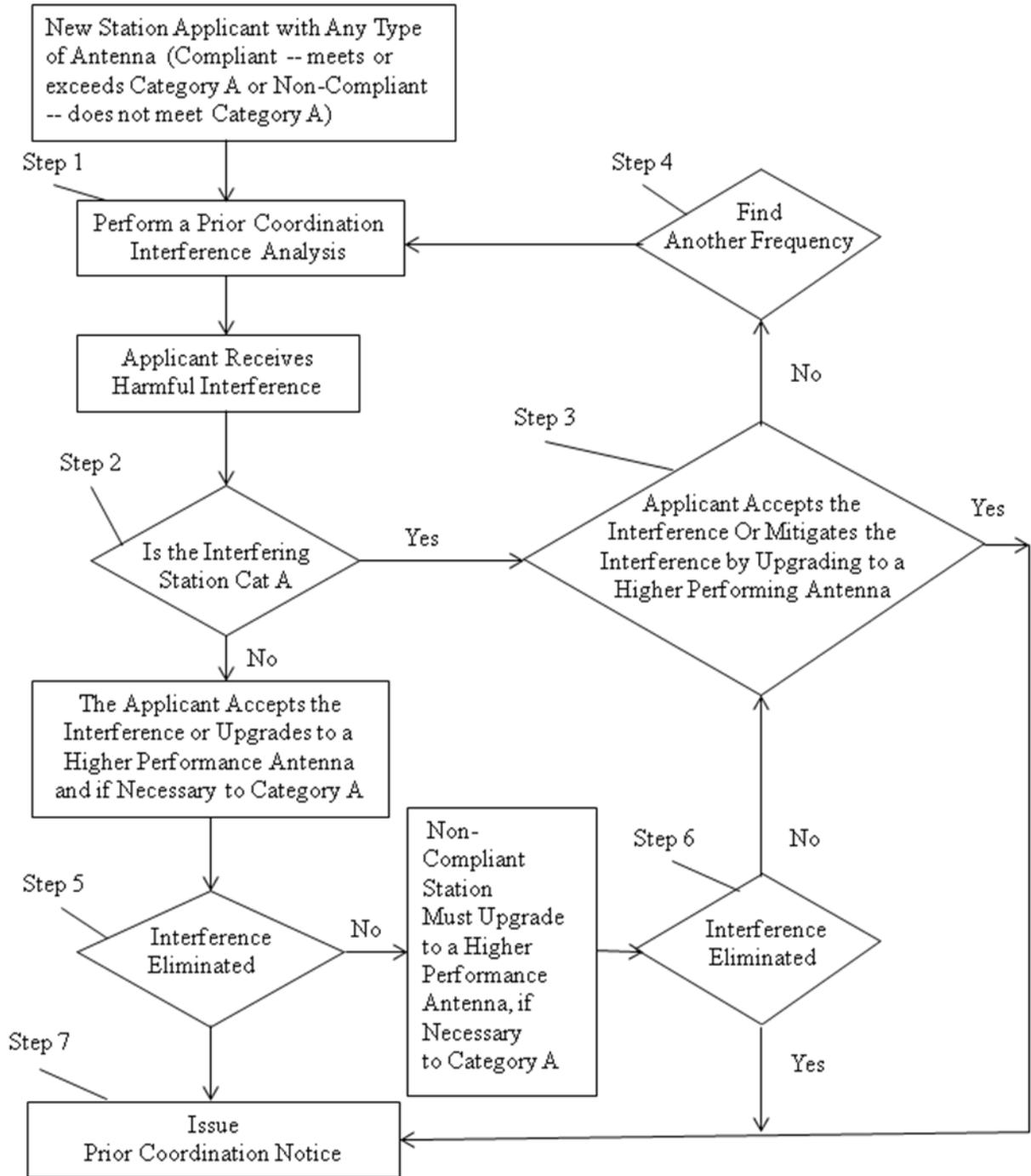
Step 2a.

If the victim station(s) were authorized with compliant (Category A) antennas, the applicant would proceed to Step 2c where the applicant would have to decide if the interference could be eliminated by increasing the applicant's antenna performance (size) or by reducing the power applied to the antenna (or both), and still meet the new applicant's path performance and/or cost requirements. If yes, the applicant would proceed via Step 2 to Step 3 and issue a PCN. If the answer was no, the applicant would proceed to Step 2d and find another frequency before returning to Step 1.

If the victim station were authorized with a non-compliant antenna, the victim would, as required by Rule 101.115 (c), (including the proposed footnote) have to either accept the interference or upgrade the antenna performance, if necessary to Category A. If this eliminated the interference issue, the applicant would proceed to Step 3. However, if the victim upgraded to a Category A antenna and the interference still existed, the applicant would proceed to Step 2c. If at Step 2c the applicant could not lower the EIRP and meet the applicant's path performance and/or cost requirements, the applicant would have to proceed to Step 2d and choose another frequency before returning to Step 1.

The case where the new applicant has shown through the prior coordination process that it will not *cause* harmful interference, but that it would *receive* harmful interference, is addressed in Figure 2. A walkthrough of Figure 2 is given below.

Figure 2: Applicant Does Not Cause Interference but Receives Interference



Step 1.

The new applicant, with any type of antenna, performs a prior coordination interference analysis in accordance with Rule 101.103. The prior coordination interference analysis shows interference into the applicant's receiver. The applicant proceeds to Step 2.

Step 2.

The applicant determines if the interfering station is authorized with a compliant (Category A) or a non-compliant antenna. If a Category A antenna, the applicant proceeds to Step 3.

Step 3.

Applicant must either accept the interference or attempt to eliminate the interference by upgrading to a higher performance (larger) antenna. If the applicant can accept the interference or can accept a higher performance (larger) antenna then the applicant proceeds to Step 7 (Issue PCN). If the applicant cannot accept the interference or a higher performance (larger) antenna, the applicant must proceed via Step 4 (Find Another Frequency) to Step 1. If at Step 2 the interfering station was determined to be authorized with a non-compliant antenna, because the new applicant is also using a non-compliant antenna, the new applicant must either accept the interference or attempt to mitigate the interference by upgrading to a higher performance (larger) antenna, including up to Category A. If at Step 5 the interference was eliminated, proceed to step 7 (Issue PCN). If having upgraded to Category A the new applicant still receives harmful interference, then pursuant to Rule 101.115 (c) the non-compliant station is required to upgrade the antenna performance, if necessary to Category A. If the interference is eliminated, the applicant proceeds to Step 7 and issues a PCN. If the interference is not eliminated with a Category A antenna, the applicant proceeds to Step 3.

III. Summary and Conclusions

A review of the Rules using the decision tree flow diagrams shows that non-compliant antennas with any antenna pattern and size can be safely used under existing Rules 101.103 and 101.115.

Therefore for clarification WSI respectfully recommends that the Commission add a footnote to Rule 101.115 stating:

"Non-compliant antennas (antennas not meeting Category A specifications) are authorized on the condition that they must not cause harmful interference and must accept harmful interference pursuant to Rules 101.103 and 101.115 (c). When Rule 101.115 (c) requires the licensee of a station using a non-compliant antenna system to upgrade to a higher performance antenna, the licensee must comply with the requirement within thirty (30) days."

By this simple footnote, the Commission would achieve its goals of (a) safely allowing smaller antennas that will not cause harmful interference to new applicants or block new applicant paths, and (b) improving and modernizing the Rules and increasing the flexibility of Part 101 to promote wireless backhaul, enterprise and consumer wireless broadband.

Respectfully submitted,

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August 27, 2013