Mimosa Networks proposal lacks substantive technical direction. It does not provide a means for arbitrating co-channel interference within its own service. Mimosa does not specify if the system shall be directional for backhaul usage or omni-directional for broadband local service. Granting this petition in its current form would be a waste of precious spectral resources.

Mimosa's proposal does not adequately protect existing governmental radar users.

Mimosa's proposal does not address diversity reception, a critical technique long proven by long haul communications systems in the 11 Ghz band.

Mimosa's proposed channelization does not adequately protect amateur radio and amateur satellite allocations, the edges of the proposed guard bands are too close to the common frequencies used by amateur radio.

Mimosa does not cover the use of spectral masking to ensure protection to users within band and to commercial services at the proposed band edges.

The wide bandwidth receiver proposed by Mimosa is technically diametrically opposite to the device needed to protect existing narrowband users in terms of noise floor. I find it difficult to believe adaptive techniques would protect existing users. Radar and Amateur users often are not in fixed locations. They "pop up" into new situations. It would be difficult for a device with Mimosa's desired ERP to detect the "intruding" existing mobile user.

While I applaud Mimosa's "protection" of Amateur radio allocations, perhaps the two channels adjacent to the 10.368 Ghz region should be split to 5 Mhz channels, allowing a greater allocation to Amateur radio, and providing a guard band. The proposed allocation does not allow enough spectral space for amateur usage of data or video signals. It does not allocate enough bandwidth use to allow spread spectrum or other experimental techniques to be used by amateurs.

If the 10 Ghz spectrum is to be split, consideration should be given to other uses such as local short-haul links, National Security, Ranging and Positioning, speed radar, Door openers, and Aviation communications/navigation. All of which could have a vested interest in the 10 Ghz region.

A wide variety of license free devices operate at 10.5 Ghz. How would this proposal protect those existing users?

Mimosa does not address interference to existing low power Ultrawideband (UWB) license free users near and overlapping the 10 Ghz region.

Mimosa 's proposed effective radiative power (ERP) is much higher than needed for this application, which suggests Mimosa wishes to use small diameter dish antennas with wide beamwidths, which has been proven in other link services to cause co-channel interference.

Perhaps half of the desired spectrum could be allocated to Mimosa's proposal and still provide WISP (Wireless Internet Service Providers) with sufficient new backhaul spectrum. However such spectrum should be coordinated and lightly licensed to ensure proper use of a precious national resource.

I am a current user of 10 Ghz spectrum.

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