

Dear Sirs-

I 100% oppose the reallocation of any portion of the 10GHz band as requested by Mimosa. The reasons are very basic.

- 1) 10GHz offers no protection from rain-fade nor other propagation anomalies that the lower bands do.
- 2) This is a clear and blatant attempt by the applicant to gain free access to spectrum that they technically know little about. Their proposed ERP levels run the risk of exceeding the limits set-forth in OET-65 with no absolute plans to address this fact.
- 3) This is yet another blatant "spectrum grab" that is in attempt no different from the attempt by Light Squared in the GNSS band.
- 4) Your very agency has already made E-Band open and easy to access to address the nation's needs for "last mile" broadband data access. This attempt by Mimosa should be viewed as their direct appetite to "thumb their noses" at your agency in regards to E-Band.
- 5) No solid and firm plans have been offered by the applicant to address the existing users of the 10GHz band, not the least of which are Part 97 users that deal with extremely weak signals such as "moon bounce" and other wide-band digital communications links such as D-Star.
- 6) Domestic Public Safety users of this spectrum will also suffer RF interference issues. The applicant offered no plans to help fund re-banding of 1000's of Public Safety RADAR users of the 10GHz band.
- 7) The entire process has a flaw that is the equal of "selling off" national parks or public lands to aid a large commercial company.
- 8) Recall the 100% total disaster that took place in the 220 to 222MHz band. Why not re-allocate that to Mimosa?

Regards,  
Sr. Prin. RF Engineer for major DoD (X-band) contractor and private amateur radio operator,  
Brian Justin