



August 4, 2014

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: *Revision of Part 15 of the Commission's Rules to Permit  
Unlicensed National Information Infrastructure (U-NII) Devices in  
the 5 GHz Band, ET Docket No. 13-49***

Dear Ms. Dortch:

CBF Networks, Inc. (d.b.a Fastback Networks) ("Fastback")<sup>1</sup> writes in support of the Petitions<sup>2</sup> that seek reconsideration of the more restrictive out-of-band emissions limits for devices that operate in the 5725-5850 MHz band that were adopted in the *First Report and Order* ("*First R&O*") in the above-captioned proceeding.<sup>3</sup>

The Commission concluded that equipment operating in the 5725-5850 MHz band and certified under Section 15.247 should meet the more restrictive out-of-band emission ("OOBE") limits set forth in Section 15.407. As discussed by the Wireless Internet Service Providers Association ("WISPA") and others, the more restrictive OOBE limits established in the *First R&O* will have a significant

---

<sup>1</sup> Fastback Networks manufactures high-speed outdoor wireless networking products that connect metropolitan area fiber optic networks to broadband access points such as commercial buildings, cellular base stations, or WiFi hotspots. Fastback Networks has participated extensively in the above-captioned proceeding, filing comments and participating in *ex parte* meetings.

<sup>2</sup> Petition for Partial Reconsideration of the Wireless Internet Service Providers Association, ET Docket No. 13-49 (June 2, 2014) ("*WISPA Petition*"); Petition for Reconsideration of Cambium Networks, Ltd, ET Docket No. 13-49 (June 2, 2014) ("*Cambium Petition*"); Mimosa Networks, Inc. Petition for Partial Reconsideration, ET Docket No. 13-49 (June 2, 2014) ("*Mimosa Petition*"); Petition for Partial Reconsideration of the JAB Wireless, Inc., ET Docket No. 13-49 (June 2, 2014) ("*JAB Petition*").

<sup>3</sup> *In the Matter of Revision of Part 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band*, First Report and Order, ET Docket No. 13-49 (rel. April 1, 2014) ("*First R&O*").

impact on the ability of manufacturers to design and produce equipment that can be used for longer range, point-to-point broadband wireless links that are widely used in rural and other underserved areas.<sup>4</sup> Such links are used to provide broadband Internet access services, wireless backhaul, and other services, and for broadband links used by electric utilities and other critical infrastructure industry companies. The more restrictive OOB limits adopted in the *First R&O* could significantly hinder some of these services.

In reconsidering these more restrictive OOB limits, the Commission should give adequate weight to the public's need for access to accessible and reasonably-priced wireless broadband in rural and other areas underserved by larger, national broadband providers. As argued by WISPA, Cambium, and other Petitioners, the Commission has imposed unnecessarily restrictive rules on the presumption – one not supported by the record – that retaining the current rules would result in harmful interference, and despite the lack of record of interference from compliant devices operating under the current, less restrictive rules.<sup>5</sup>

Finally, Fastback notes that the more restrictive OOB rule adopted in the *First R&O* requires more complex RF filters that will significantly increase the production cost of equipment used for long-range point-to-point wireless broadband links or require additional links to cover the same distances.

For these reasons, Fastback urges the Commission to reconsider its decision to adopt the more restrictive OOB limit for equipment operating in the 5725-5850 U-NII band.

Respectfully submitted,

/s/ Kevin J. Negus  
Dr. Kevin J. Negus  
Chairman, CTO and Co-Founder  
FASTBACK NETWORKS  
2460 North First St., Suite 200  
San Jose, CA, 95131  
Phone: 408-430-5440

---

<sup>4</sup> WISPA Petition at 8-10; Cambium Petition at 6-10.

<sup>5</sup> WISPA Petition at 11-12; Cambium Petition at 12-14.