

WT 07-121

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MAR 26 2007

Federal Communications Commission
Office of the Secretary

March 26, 2007

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street
Washington, D.C. 20554

Re: Wireless Strategies Inc.
Request for Declaratory Ruling

Dear Ms. Dortch:

On behalf of the Fixed Wireless Communications Coalition ("FWCC"), I am writing to express FWCC's serious concerns regarding the Request for Declaratory Ruling ("Request") filed on February 27, 2007 by Wireless Strategies Inc. ("WSI"), in which WSI asks the FCC to declare that "a Fixed Service licensee is permitted to simultaneously coordinate multiple links whose transmitter elements collectively comply with the Commission's antenna standards and frequency coordination procedures."¹ Because WSI's proposal has potentially grave interference ramifications for providers of fixed wireless service, the FWCC asks that the FCC either deny the Request outright or, in the alternative, take no action on it without first initiating a rulemaking proceeding that provides interested parties a full and fair opportunity to submit comments on the matter.

Our preliminary review of the Request reveals that WSI's proposal could result in significant interference to existing, licensed point-to-point microwave systems. It is particularly alarming that WSI has not submitted any meaningful technical data in support of its claim that use of sidelobe frequencies via "distributed radiating elements" would not run afoul of the required radiation pattern envelope and beamwidth requirements set forth in Section 101.115 of the Commission's Rules (47 C.F.R. § 101.115). FWCC also believes that WSI's "concurrent coordination" concept is highly dubious and, once again, WSI has not submitted any technical data demonstrating otherwise.²

¹ Request at 1. To the best of FWCC's knowledge, the FCC has yet to assign a file or docket number to WSI's Petition.

² Request at 4-6.

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In any case, even if the FCC were to determine that WSI's Request is worthy of further consideration, the agency should not entertain such a dramatic change to its rules and/or policies without conducting a rulemaking proceeding to test the validity of WSI's technical arguments. The surmise offered in WSI's Request is hardly sufficient to justify exposing fixed wireless licensees to an unwarranted risk of interference. Conversely, a rulemaking would ensure that the FCC has a complete record on the matter, and thus will be in a position to make a fully informed decision that takes the concerns of all affected parties into account.

Should you have any questions concerning the above, please contact the undersigned.

Respectfully submitted,

/s/ Dennis J. Guill

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