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June 29, 2012

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

Re: WT Docket No. 10-153, Amendment of Part 101 to Facilitate Wireless Backhaul

Dear Ms. Dortch:

On behalf of the Fixed Wireless Communications Coalition (FWCC),¹ pursuant to Section 1.1206(b)(2) of the Commission's Rules, I am electronically filing this written *ex parte* communication in the above-referenced docket.

Previous filings by the FWCC have addressed the issue of converting the voice-circuit equivalents in Section 101.141(a)(3) to a bits/sec/Hz standard. At a meeting on June 20, we briefly discussed the matter

¹ The FWCC is a coalition of companies, associations, and individuals interested in the Fixed Service—i.e., in terrestrial fixed microwave communications. Our membership includes manufacturers of microwave equipment, fixed microwave engineering firms, licensees of terrestrial fixed microwave systems and their associations, and communications service providers and their associations. The membership also includes railroads, public utilities, petroleum and pipeline entities, public safety agencies, cable TV providers, backhaul providers, and/or their respective associations, communications carriers, and telecommunications attorneys and engineers. Our members build, install, and use both licensed and unlicensed point-to-point, point-to-multipoint, and other fixed wireless systems, in frequency bands from 900 MHz to 95 GHz. For more information, see www.fwcc.us.

with officials of the Wireless Telecommunications Bureau, and proposed to update the FWCC's earlier recommendations.² This letter is that update.

Section 101.3 Definitions

The FWCC supports the Commission proposal in the Further Notice of Proposed Rulemaking,³ also endorsed by Comsearch:

Payload Capacity. The bit rate available for transmission of data over a radiocommunication system, excluding overhead data generated by the system.

Section 101.141 Microwave Modulation

The FWCC proposes that the Commission replace the table at Sec. 101.141(a)(3) with the table immediately below:⁴

Frequency Range (MHz)	Emission Bandwidth up to and incl. 5 MHz (bits/sec/Hz)	Emission Bandwidth over 5 and up to and including 20 MHz (bits/sec/Hz)	Emission Bandwidth greater than 20 MHz (bits/sec/Hz)
3700-10,700	2.4	4.4	
10,700-13,250	2.4	4.4	3.0
above 13,250	1.0	1.0	

The following table, which we do **not** offer for inclusion in the rules, provides the source and/or comparison with the current rules for the proposed bit rates in each band:⁵

² Letter from Mitchell Lazarus to Marlene H. Dortch, Secretary, FCC in WT Docket No. 10-153 (filed June 21, 2012).

³ *Amendment of Part 101 to Facilitate Wireless Backhaul*, Report and Order, Further Notice of Proposed Rulemaking, and Memorandum Opinion and Order, 26 FCC Rcd 11614 (2011).

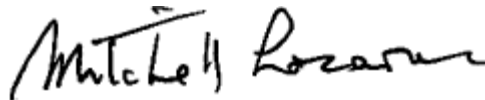
⁴ Comsearch submitted a similar, but not identical, table in its Reply Comments of Nov. 25, 2011.

⁵ The FWCC submitted a similar, but not identical, table in its Comments of Oct. 4, 2011.

Band (MHz)	Channel Bandwidth (MHz)	Proposed Minimum Payload Capacity (bits/sec/Hz)	Current Rules (bits/sec/Hz)	Industry Canada Standard Radio System Plan
3700-4200	20 MHz and greater	4.4	4.47	303.7
5925-6425	up to and incl. 5 MHz	2.4	2.47-3.86	305.9
	10 MHz and greater	4.4	4.47	
6525-6875	up to and incl. 5 MHz	2.4	2.47-3.86	
	10 MHz and greater	4.4	4.47	
6875-7125	FWCC proposes: same as 6 GHz		N/A	306.5
10,550-10,680	up to and incl. 5 MHz	2.4	2.47-3.86	310.5
10,700-11,700	up to and incl. 5 MHz	2.4	2.47-3.86	310.7
	above 5 MHz up to and including 20 MHz	4.4	4.47	
	above 20 MHz	3.0	2.98-3.35	
12,700-13,150	FWCC proposes: same as 11 GHz		N/A	312.7
17,800-19,700	all	1.0	1.0	317.8
21,200-23,600	all	1.0	1.0	

We hope the Commission finds these suggestions helpful. Please do not hesitate to contact me with any questions.

Respectfully submitted,



Mitchell Lazarus
 Counsel for the Fixed Wireless
 Communications Coalition

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