

Before the
Federal Communications Commission
Washington DC 20554

In the Matter of)	
)	
BridgeWave Communications, Inc.,)	WT Docket No. 11-25
Request for Waiver of Section 101.147(r))	
to Permit Channel Aggregation by Non-MVPD)	
Users of the 18 GHz Band)	

**COMMENTS OF THE
FIXED WIRELESS COMMUNICATIONS COALITION**

The Fixed Wireless Communications Coalition (FWCC)¹ files these Comments on the above-captioned waiver request.

BridgeWave Communications, Inc. seeks a waiver of Section 101.147(r) of the Commission’s Rules to authorize its users to aggregate contiguous channels in the 17.7-19.7 GHz band for operation over a single carrier. BridgeWave asserts that such a waiver would not create an interference risk to other users. It proposes to advise its users that they must otherwise comply with all relevant Part 101 technical rules.

The FWCC does not oppose BridgeWave’s request to aggregate up to three 50 MHz channels, but is concerned with spectrum efficiency in the band. The FWCC accordingly

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.

suggests the following conditions to supplement the overall Part 101 compliance proposed by BridgeWave:

- Systems operating on two or more aggregated channels must maintain a bandwidth efficiency of at least 6 bps/Hz over the occupied band.
- The modulated carrier must occupy the entire aggregated channel.
- Systems operating on aggregated channels must comply with the same emission mask requirements (at the edges of the aggregated band) that are currently applicable to single channels.

BridgeWave's proposal is similar in some respects to the FWCC's pending Petition for Rulemaking on combining adjacent channels in the lower 6 and 11 GHz bands.² We agree with BridgeWave that the flexibility to aggregate contiguous channels will help carriers lower costs, improve reliability, and eliminate intermodulation issues as demands on backhaul capacity continue to increase. To achieve these advantages, however, it is essential that aggregation be conditioned on maintaining spectrum efficiency.

The Commission should permit adaptive modulation in the proposed aggregated channels, subject to the outcome of the rulemaking in WT Docket No. 09-106.³ Adaptive modulation will allow efficient operation while protecting channel operation from propagation anomalies, particularly over long links in rural areas. Given the large amount of traffic to be carried over aggregated channels, adaptive modulation will be essential to preserving continuity of service.

² *Fixed Wireless Communications Coalition, Petition to Amend Part 101 of the Commission's Rules to Authorize 60 and 80 MHz Channels in Certain Bands for Broadband Communications*, RM-11602, Petition for Rulemaking (filed May 14, 2010).

³ *Amendment of Part 101 of the Commission's Rules to Facilitate the Use of Microwave for Wireless Backhaul and Other Uses and to Provide Additional Flexibility to Broadcast Auxiliary Service and Operational Fixed Microwave Licensees*, Notice of Proposed Rulemaking and Notice of Inquiry, 25 FCC Rcd 11246, 11258-11261 (2010).

The above conditions will ensure that any waiver permitting operation over aggregated channels addresses both spectrum efficiency and continuity of service.

Respectfully submitted,

Mitchell Lazarus
Christine E. Goepf
FLETCHER, HEALD & HILDRETH, P.L.C.
1300 North 17th Street, 11th Floor
Arlington, VA 22209
703-812-0400
Counsel for the Fixed Wireless
Communications Coalition

March 15, 2011

CERTIFICATE OF SERVICE

I, Deborah N. Lunt, a secretary with the firm of Fletcher, Heald & Hildreth, PLC, hereby state that true copies of the foregoing COMMENTS were sent this 15th day of March, 2011, by first class mail, postage prepaid to the attached service list, except those listed at the FCC, which are hand delivered.

A handwritten signature in black ink, appearing to read "D. Lunt", with a long horizontal flourish extending to the right.

Deborah N. Lunt

SERVICE LIST

Chairman Julius Genachowski
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Commissioner Michael J. Copps
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Ruth Milkman, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

James Schlichting, Senior Deputy Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

John S. Leibovitz, Deputy Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Joel Taubenblatt, Deputy Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Mary Bucher, Assistant Chief / Senior
Technical Advisor
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Blaise Scinto, Acting Chief
Broadband Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

John Schauble, Deputy Chief
Broadband Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Robert D. Primosch
Wilkinson Barker Knauer LLP
2300 N Street NW Suite 700
Washington, DC 20037
*Counsel for BridgeWave
Communications, Inc.*