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February 22, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**VIA HAND DELIVERY**
Magalie Roman Salas, Esquire
Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Re: Oral Ex Parte
In IB Docket No. 98-172

Dear Ms. Salas:

On February 18, 2000, Fixed Wireless Communications Coalition (FWCC) representatives met with Bryan Tramont, Legal Assistant in the Office of Commissioner Furchtgott-Roth to discuss issues relating to the 18 GHz band arising from the Notice of Proposed Rulemaking in the above cited Docket. The attached viewgraphs were used in the course of the aforementioned meeting.

Respectfully submitted,

FIXED WIRELESS COMMUNICATIONS COALITION

Leonard Robert Raish

Leonard Robert Raish
Counsel, Fixed Wireless
Communications Coalition

LRR:cej
Attachments

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**FWCC**

# The 18 GHz Band

*Fixed Wireless Communications Coalition*

*Fixed Wireless Communications Coalition*

FWCC

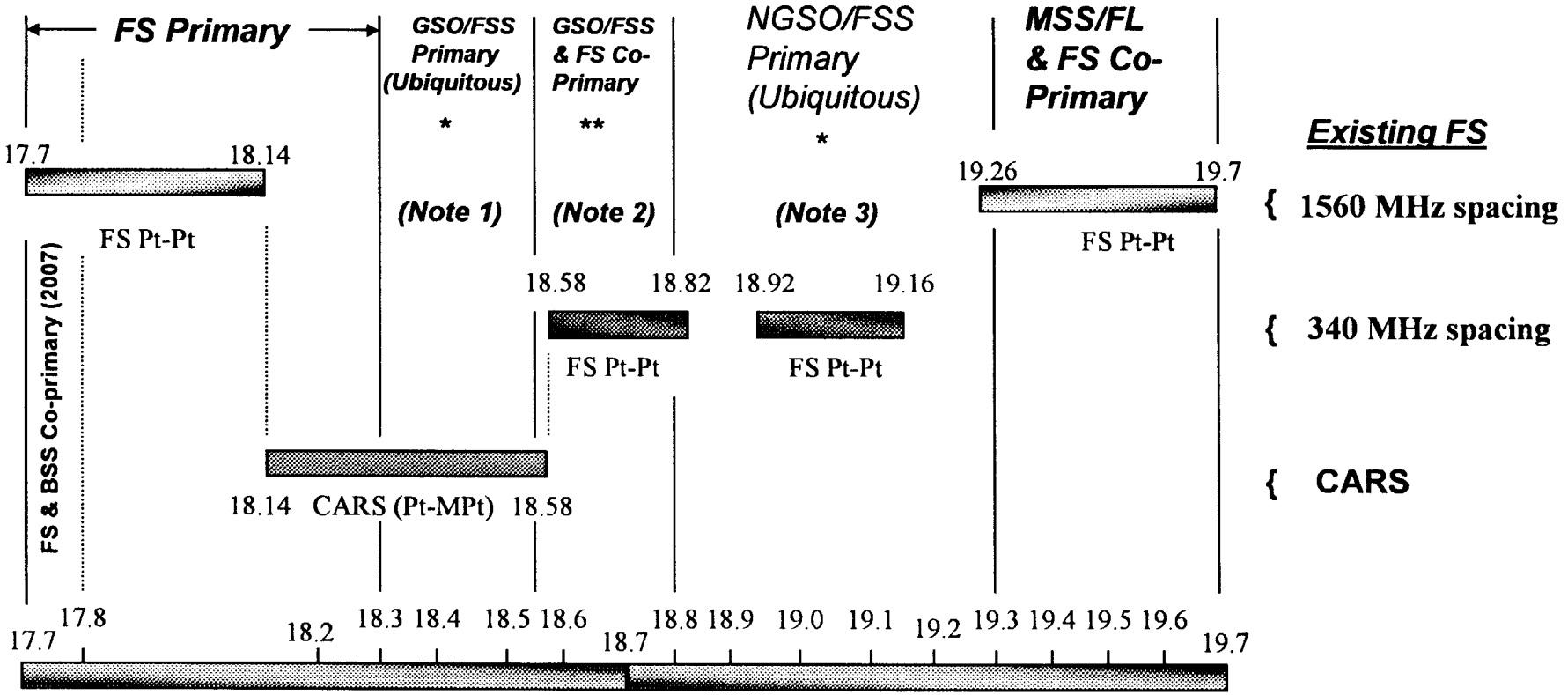
# 18 GHz Today

- Over 2500 duplex links in the Narrow Band (340 MHz-split) portion of the band.
  - ➡ Over 300% Growth since 1998.
  - ➡ Effectively made "secondary" by NPRM
- Over 1500 duplex links in the Wide Band (1560 MHz-split) portion of the band.
  - ➡ Over 50% Growth since 1998.
  - ➡ Either 80MHz or 200 MHz loss implied by NPRM

**FWCC**

# 18 GHz FCC Band Proposal

***Note: Existing FS in non-primary frequencies is to be grandfathered.***




* Ubiquitous Terminals would have difficulty sharing with existing FS, especially CARS

** FS Co-primary **of no use**, since it is paired with secondary allocation

Note 1: ~14 Applications (incl. Teledesic)
Note 2: Same as Note 1 but NO ubiquitous (coordination req'd).
Note 3: Teledesic (Skybridge II)

*Fixed Wireless Communications Coalition*

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# 18 Ghz NPRM

- Current 18 Ghz Plan:
  - 880 MHz (440 Mhz Paired Go/Return) - 1560 MHz Split
  - 480 MHz (240 Mhz Paired Go/Return) - 340 MHz Split
  - CARs (Private Cable) Occupies 18.14-18.59 (440 Mhz)
- Total = 1360 MHz Plus 440 Mhz CARs
- NPRM Proposes FS Secondary from 18.3-18.55 and 18.8-19.3
  - Eliminates 40 MHz Paired (19.26-19.3 GHz) of wide-band (1560 MHz split). Effect is 80 MHz lost!
  - Eliminates 240 Mhz paired (340 split). Effect is 480 MHz lost! Plus 280 Mhz lost of CARs Band.

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# 18 Ghz NPRM (Cont.)

- NPRM Also Proposes to Give 17.7-17.8 Ghz to BSS in 2007!
  - ➡ Co-primary, BUT FS and BSS cannot share!
  - ➡ Another 200 MHz (100 MHz paired) Lost to FS.
- PLUS - Inefficient spectrum use by narrow band radios in wide-bandwidth channels (1560 MHz split)
  - ➡ Part 101 requires 1 B/S/Hz radios.
  - ➡ 340 MHz-split channels are 5/10 MHz.
  - ➡ 4-DS1 radios fit in 5 MHz
  - ➡ Now 4-DS1 radios must go in 10 MHZ wideband channels.

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# Relocation

- 18 GHz Relocation?
  - ➡ Narrowband users could be relocated to wideband section.
  - ➡ BUT: 18 GHz WIDEBAND channels (1560 MHz split) must be re-channelized to keep from squandering the reduced spectrum!
  - ➡ Significant compensation required. Radios CANNOT be retuned.
- Private Cable CANNOT be accommodated in the WIDEBAND channels.
  - ➡ Must stay where they are or be completely relocated to another band (significant relocation costs).

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# Relocation (Cont.)

- 23 GHz Relocation?
  - ➡ Complete relocation is out of the question.
    - ♦ Band becoming increasingly congested in major metropolitan areas.
  - ➡ Some availability degradation (vs 18 GHz).
  - ➡ Commission must act on TIA petition for re-channelization
- 38 GHz Relocation?
  - ➡ Shorter path lengths required in most cases.
    - ♦ Higher rain-induced outage
  - ➡ Economic penalty could inhibit FS application to many emerging business opportunities.

**FWCC**

# Conclusion

- The FS can give up the 340-MHz narrow band channels at 18 GHz.
  - ➡ But, the wide band channels must be re-channelized.
    - ♦ Bulk of the applications are for 4-DS1 radios.
- 100 MHz to BSS would result in an additional **UNACCEPTABLE** 23% FS frequency loss
- 23 GHz must also be re-channelized.
  - ➡ Required for efficient spectrum use to ensure FS growth.
- Private cable CANNOT be relocated into the wide band channels.
- In all cases, relocated FS must be fairly compensated!