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FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Amendments of Parts 21 and 94 of the Commission's Rules to Establish a Channel Plan and Technical Rules for the 37.0-38.6 GHz Band	))))	RM-8553 DOCKET FILE COPY ORIGINAL

COMMENTS OF MICROWAVE RADIO CORPORATION

These comments are submitted by Microwave Radio Corporation ("MRC") in support of the above-captioned petition ("the TIA Petition").

MRC, a subsidiary of California Microwave, is a U.S. manufacturer of microwave radio equipment, with headquarters in Chelmsford, MA. MRC is the world's leading manufacturer of microwave radios operating in the 37.0-40.0 GHz range. MRC has shipped over 5,000 of these radios to Personal Communications Service ("PCS") operators in the United Kingdom. And MRC stands ready to provide these units to PCS operators and other users in this country.

As shown in the TIA Petition, a massive demand for radios operating in this frequency range is expected, as soon as the FCC grants PCS licenses. The 37.0-38.6 GHz channels are well-suited to interconnect PCS cell sites. Based on the large volumes of radios already produced for European applications, manufacturing costs have fallen

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substantially, resulting in a highly cost-competitive product. With these radios available, PCS operators need not rely solely on leased capacity from telephone and cable TV companies.

Numerous license applications have already been received for the 38.6-40.0 GHz channels,[1] more than can be accommodated. The current channel plan for the 38.6-40.0 GHz band provides only fourteen channel pairs. The TIA Petition would double that number, and in addition would provide four unpaired channels.

The 37.0-38.6 GHz band is already allocated for Fixed service, but now lies fallow. Consequently, nobody would be harmed by the proposed channel plan and service rules.

We urge the Commission to act favorably and expeditiously on the TIA Petition. The 37.0-38.6 GHz channels should be available to new PCS operators as they begin their network construction in early 1996. But a delay in adopting the channel plan could delay the rollout of PCS, and could increase cost to the public if PCS operators are forced to employ higher-priced means to interconnect cell sites.

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[1]"Over the past several months, the volume of 38 GHz applications has increased substantially." FCC Public Notice, mimeo #44787, released September 16, 1994.

In light of these considerations, the Commission should promptly grant the TIA Petition and adopt operating rules and a channel plan for the 37.0-38.6 GHz band.

Respectfully submitted,

Microwave Radio Corporation

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December 27, 1994

Certificate of Service

I, Jeffrey Krauss, hereby certify that on December 27, 1994 I sent a copy of the "Comments of Microwave Radio Corporation" to the following:

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