

Siemens Information and Communication Networks, Inc.  
900 Broken Sound Parkway  
Boca Raton, Florida 33487

April 21, 1999

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

**Re: IB Docket No. 97-95; RM-8811**

Dear Ms. Salas:

Siemens Information and Communication Networks, Inc. ("Siemens") files this letter in support of WinStar Communications, Inc.'s Opposition to the Petitions for Reconsideration of the V-band Order.<sup>1</sup> Siemens is based in Boca Raton, Florida and is a leading manufacturer of telecommunications equipment. As such, Siemens already has begun to work with terrestrial wireless licensees in the 38.6-40.0 GHz band on the development of equipment for this band, including state-of-the-art point-to-multipoint equipment. Consequently, Siemens has a keen interest in the outcome of this proceeding.

Siemens agrees with WinStar that the Order correctly segmented use of the 36.0-51.4 GHz band (the "V-band"). Moreover, because sharing between satellite systems and ubiquitous terrestrial wireless systems is not currently feasible, Siemens strongly supports the Commission's installation of an FCC use designator in the 38.6-40.0 GHz band for terrestrial wireless operations on a primary, exclusive basis. Siemens has designed equipment for this spectrum allocation and is very concerned that changes to the use of the spectrum could negatively affect its design and manufacturing efforts.

As described in WinStar's Opposition, the important purpose of segmentation is to protect licensees from interference so that they have the incentive to fully build out their systems. However, the proposals in the Petitions would introduce interference issues and disrupt the services and buildout plans of terrestrial licensees in the 38.6-40.0 GHz band. Accordingly, the Commission should deny the Petitions to the extent that they include reconsideration of the designation of the 38.6-40.0 GHz band.

Sincerely,



Frederick R. Fromm

President

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<sup>1</sup> See Opposition of WinStar Communications, Inc. to Petitions for Reconsideration, IB Docket No. 97-95, RM-8811 (filed April 6, 1999).

**CERTIFICATE OF SERVICE**

I, Kenneth J. Russell, do hereby certify that on this 21st day of April 1999, a copy of the foregoing letter in support of WinStar Communications, Inc.'s Opposition to the Petitions for Reconsideration of the V-band Order were delivered by mail, postage pre-paid, to the following parties:

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/s/ Kenneth J. Russell  
Kenneth J. Russell