

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Allocation and Designation of Spectrum)	
for Fixed-Satellite Services in the 37.5-)	IB Docket No. 97-95
38.5 GHz, 40.5-41.5 GHz and 48.2-50.2)	
GHz Frequency Bands; Allocation of)	RM-8811
Spectrum to Upgrade Fixed and Mobile)	
Allocations in the)	
40.5-42.5 GHz Frequency Band;)	
Allocation of Spectrum in the 46.9-47.0)	
GHz Frequency Band for Wireless)	
Services; and Allocation of Spectrum in)	
the 37.0-38.0 GHz and)	
40.0-40.5 GHz for Government)	
Operations)	

COMMENTS OF DMC STRATEX NETWORKS INC.

Pursuant to Section 1.415 of the Commission’s Rules, DMC Stratex Networks Inc. (“DMC”)¹ hereby submits these comments in the above-captioned proceeding.

I. SUMMARY

DMC in general, fully supports the FCC’s proposals to modify the 37.0–43.5 GHz portion of the band plan in order to harmonize the US domestic band plan with the international sharing arrangement established at WRC-2000, and to promote spectrum efficiency.

¹ DMC Stratex Networks, formerly known as Digital Microwave Corporation, is a San Jose, California, based, Manufacturer of high capacity wireless products serving the Cellular, Broadband Wireless, PCS and Common Carrier industries. DMC is a major supplier of point to point wireless products for the frequency band, which is the subject of this FNPRM.

DMC also supports the proposed addition of the band 42.5 – 43.5 GHz for fixed service for non-Government use.

COMMENTS ON SPECIFIC SECTIONS.

C. Proposed PFD Limits, paragraphs 35-44

DMC supports using the U.S./CITEL method of defining the max. value of PFD under clear sky propagation but permitting the transmitted value to be increased up to the maximum ITU defined value (Article S21) under faded conditions. DMC supports the clear sky value, agreed upon at WRC200, of 12dB lower than the Article S21 value. This reduced PFD value is required to protect ubiquitously deployed HDFS receivers. The ITU method defines the maximum power, but in reality in order to conserve power, the satellite should normally operate at the lower value, and only increase power to the S21Value under faded conditions. What still remains to be determined is the maximum period of time that the satellite would normally exceed the lower value in order to combat fading This period of time is where un-correlated fading could give rise to interference into the FS receivers and therefore needs to be defined. The permissible time is currently under study in ITU Study Group 9 and W.P.4-9s. DMC believes that the value of permissible time that the S21-12dB value can be exceeded should be determined by the outcome of the ITU studies.

D. Satellite Earth Stations paragraphs 45-51

DMC fully supports the proposed restrictions to prevent ubiquitous deployment of earth stations in the frequency band 37.5 – 40 GHz. DMC is concerned however, that despite the proposed limitation of Earth Stations to Gateway type stations, there is a need to ensure that the application of Gateway Earth stations will not impose any constraints on the development of High Density Fixed Service Networks. The Commission is aware

that the Fixed Wireless Communications Coalition, (FWCC), of which DMC is a member, is concerned that more equitable sharing rules than those currently being applied to bands which are designated as co-equal primary, need to be applied to all new cases of sharing between Satellite Earth Stations and Fixed Service systems. This topic has been extensively addressed in the FWCC request for Declaratory Ruling on Partial-Band Licensing of Earth Stations.²

In conclusion DMC is fully supportive of the FCC's proposals to modify the domestic Designation and Allocation of spectrum to align with the decisions made at WRC2000 as reflected in this FNPRM.

Respectfully submitted,

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² IB Docket No. 00-203 RM-9649