

**Before the
Federal Communications Corporation
Washington, D.C. 20554**

In the Matter of

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|--|---|---------------------|
| Allocation and designation of Spectrum for |) | |
| Fixed-Satellite Services in the 37.5 GHz-38.5 GHz, |) | |
| 40.5-41.5 GHz and 48.2-50.2 GHz Frequency Bands; |) | |
| Allocation of Spectrum to Upgrade Fixed and Mobile |) | IB Docket No. 97-95 |
| Allocations in the 40.5-42.5 GHz Frequency Band; |) | |
| Allocation of Spectrum in the 46.9-47.0 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 |) | |

Background

Harris Corporation is an international communications equipment company focused on providing product, system, and service solutions for commercial and government customers. The company's five operating divisions serve markets for microwave, broadcast, network support, tactical radio and government communications systems. Harris is the leading provider of microwave radio products and systems in North America, with more than 43 years of experience in the wireless industry and installed microwave systems in more than 150 countries.

Harris appreciates and supports the Commission's actions to create a workable plan for the 36.0-51.4 GHz band. In many respects, the Commission's proposals have created a foundation for future deployment of fixed wireless services that will permit rapid deployment, room for future growth and minimization of sharing burdens. The result of the Commission's actions provides fixed wireless service enterprises with

sufficient certainty for current and future operations and sufficient spectrum to benefit consumers.

These bands are used to provide broadband, fixed point-to-point, point-to-multipoint terrestrial wireless services. High capacity broadband networks use radio spectrum for short links in more than 60 markets nationwide. Fixed wireless microwave systems provide a cost effective, reliable, quickly deployable means of connecting users of voice, data, and video traffic to network facilities, PSTN, Internet or fiber backbone placements.

Reply Comments of Harris Corporation

Harris Corporation submits its comments with respect to the *Further Notice of Proposed Rulemaking (“FNPRM”)* issued in the proceeding captioned above.

1. Questions and concerns raised about the viability of fixed wireless services may be based on an unclear recollection of the history of recent auctions. Auction-won licenses to deploy fixed service systems were delivered to providers less than 12 months ago. These licenses, which carry a 10 year term, were acquired by the fixed wireless industry with the clear intention of using them to bring services to consumers. Fixed service deployments are expanding, which the Commission has recognized by recently granting license renewals.
2. Admonitions by some that the Commission abandon the limitation of satellite use of the 37.5-40.0 GHz band to gateways serving individual customers may be based on a misunderstood recollection of the Commission’s recent actions. The Commission, in the Notice of Proposed Rulemaking, follows the results of the

WRC-2000 and designates the 37.0-40.0GHz and 42.0-42.5 GHz bands for terrestrial services. Additionally, the Commission placed satellite services in the 40.0-42.0 GHz band. Harris believes both of these previous Commission actions were correct and need not be altered at this time. Furthermore, Harris believes that fixed service use in these terrestrial-designated bands should never be obstructed by satellite deployments. Stated again, fixed service providers purchased licenses at auction to operate in the 38.6-40.0 GHz band, which can only be accomplished successfully if the Commission adheres to its earlier position.

3. Proposals of some to increase satellite power levels and to remove specific limits on the percentages of time that satellite providers may increase their power levels are attempts to misinterpret and rewrite recent history. Harris opposes these proposals, which, if granted by the Commission, would reverse the progressive accomplishments of WRC-2000 in this area. Additionally, and more ominously, these unwarranted proposals would result in the harmful radiation of the terrestrial designated bands at levels and for amounts of time that are simply unacceptable. The correct action to be taken by the Commission in this area is to protect terrestrial operations below 40 GHz and to make unambiguously clear through this rule-making process that satellites may only exceed power levels for clearly defined, short-term events.

Harris Corporation urges the Commission to preserve and protect fixed wireless service in all frequency bands to ensure that America's consumers have access to reliable and affordable choices.

Respectfully Submitted,

HARRIS CORPORATION

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