

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

In the Matter of

WTB Seeks Comment on Proposal to Revise  
Multichannel Multipoint Distribution Service  
and the Instructional Television Fixed Service  
Rules

**DA 02—2732  
RM-10586**

**To: The Commission**

**COMMENTS OF CLEARWIRE EQUIPMENT, LLC.**

Clearwire Equipment, LLC. (“Clearwire Equipment”) hereby submits these Comments in response to the Public Notice released October 17, 2002.<sup>1</sup>

Clearwire Equipment, a private Buffalo-based company that became independent in 2001, is a provider of Broadband Wireless Access network solutions. The Clearwire Equipment solution is designed for business customers demanding non line-of-sight flexible, high quality, broadband Internet protocol (IP) based communication services.

**I. CLEARWIRE EQUIPMENT’S INTEREST IN THIS PROCEEDING**

Clearwire Equipment designs and manufactures Software Defined Radio (SDR) equipment that has the ability to operate across multiple frequency authorizations including the

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<sup>1</sup> Wireless Telecommunications Bureau Seeks Comment on Proposal to Revise Multichannel Multipoint Distribution Service and the Instructional Television Fixed Service Rules, Public Notice, DA 02-2732 (RM-10586), released October 17, 2002.

frequency band allocated for Multichannel Multipoint Distribution Services (MMDS) and the Instructional Television Fixed Service (ITFS)<sup>2</sup>. Clearwire Equipment is keenly interested in any proposed changes to the current regulations governing these frequency authorizations which would enable advanced communication services to be deployed using this spectrum, thus improving the use of the spectrum.

## **II. COMMENTS**

Clearwire Equipment is a member of the Wireless Communications Association International, Inc. (WCA) and was involved in the process which led to the white paper submitted to the Commission on October 7, 2002<sup>3</sup>. The proposal included in the WCA white paper was adopted by a large and diverse group that included representatives from license holders, service providers, and equipment manufacturers. Clearwire Equipment firmly supports proposal contained in the white paper and the process which developed it.

As a manufacturer of equipment for this frequency band, Clearwire Equipment supports changes to the regulations that would simplify the licensing process, enhance the flexibility of uses within the band, and enable nomadic and/or mobile operations within the band. Clearwire Equipment is also concerned that any changes to the regulations do not hamper the use of the band for high power, analog/digital video operations. To this end, Clearwire Equipment encourages the Commission to open an official rule making proceeding to adequately deal with

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<sup>2</sup> MMDS and ITFS stations are currently authorized to operate between 2500 and 2690 MHz under 47 CFR Parts 21 and 74.

<sup>3</sup> A Proposal For Revising the MDS and ITFS Regulatory Regime, Wireless Communications Association International, Inc., the National ITFS Association and the Catholic Television Network, October 7, 2002

the issues involved in a possible change to the regulations.

### **III. CONCLUSION**

Clearwire Equipment participated in the process which led to the proposal submitted by the Wireless Communications Association International, Inc., the National ITFS Association and the Catholic Television Network. Clearwire Equipment supports this proposal and looks forward to an official proceeding where the issues regarding this proposal and the concerns of all parties can be adequately addressed.

Respectfully submitted,

David C. Chauncey  
Chief Technical Officer  
**Clearwire Equipment, LLC.**