

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

Proposal for Revising the MDS	)	
and ITFS Regulatory Regime	)	RM-10586
by the Wireless Communications	)	DA 02-2732
Association International, Inc.	)	

**Comments of Navini Networks, Inc.**

Navini Networks, Inc. (“Navini”), by its counsel, hereby files these comments in support of proposals of the Wireless Communications Association, International, Inc. (“WCA”) in the above-referenced proceeding.

Navini is a manufacturer of “low power” wireless internet access systems. The Navini RipWave 2.6 GHz system is a non line-of-sight, synchronous CDMA system that operates in the MMDS bands. It is designed to deliver high-speed broadband access to residences, home offices and small to medium size business establishments. Using advanced digital signal processing and an adaptive phased array “smart antenna”, the Navini base station is capable of generating a custom, highly directional (“beamformed”) transmission to each user location. The adaptive phased antenna array and digital beamforming techniques provide significant enhancement in the signal to interference and signal to noise ratios, improving response station performance while minimizing interference to other spectrum users. The Navini response stations use directional antennas, are intended to be purchased commercially and do not require professional installation by an MMDS licensee (“zero install”). As an equipment manufacturer for MMDS licensees, Navini will be directly affected by the outcome of a Commission decision in this proceeding.

WCA has proposed a plan that would facilitate the development and introduction of new wireless services that would permit, among other things, deployment of broadband data services in competition with wireline and cable television services. In particular, Navini

notes, and fully supports, WCA's proposals to establish a new band plan that would create blocks of contiguous spectrum for both one-way, high power users and two-way cellular services; to abandon the site-by-site licensing approach in favor of exclusive geographic service area licensing; and to eliminate restrictions on omnidirectional antennas and the professional installation requirement for customer premises equipment. These proposals, if adopted, would remove impediments to the provision of consumer oriented, cellularized, broadband services of the type Navini systems are uniquely poised to offer.

Given the significant cooperation between all affected parties -- MDS and ITFS licensees, and manufacturers of equipment for these services -- it appears that many of the traditional concerns of these communities have been reconciled in a manner that should pave the way for expeditious Commission approval of the WCA proposals. While there may still be certain technical matters to be negotiated, Navini believes the Commission has been presented with a detailed framework that should enable a rulemaking proceeding to be put on a fast track.

As a participant in the discussions leading up to the WCA proposal, Navini is convinced that only such a broad re-evaluation of the regulatory approach to the licensing and use of MDS and ITFS spectrum will enable all parties to make the most efficient use of the spectrum and, ultimately, better serve the public.

Respectfully submitted,



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