

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

In the Matter of

Amendment of Parts 1, 21, 73, 74 and 101 of the)	WT Docket No. 03-66
Commission's Rules to Facilitate the Provision of Fixed and)	
Mobile Broadband Access, Educational and Other)	
Advanced Services in the 2150-2162 and 2500-2690 MHz)	
Bands)	RM-10586

To: The Wireless Telecommunications Bureau

REPLY COMMENTS OF COMSPEC CORPORATION

ComSpec Corporation ("ComSpec") hereby submits its Reply Comments in response to the Commission's Notice Of Proposed Rule Making and Memorandum Opinion And Order, RM-10586, Released 2 April 2003.

ComSpec is a telecommunications consulting firm with significant experience in the interference studies and application process required by the Commission's Rules for the authorization of MMDS and ITFS facilities. Over the past eleven years, ComSpec has been involved with the development of coordinated traditional and two-way MMDS and ITFS stations in over 100 markets in the United States.

ComSpec supports the Comments provided by the Wireless Communications Association ("WCA"), National ITFS Association ("NIA") and Catholic Television Network ("CTN") (together as the "Coalition") on the Proposed Rule Making for renovation of the current regulatory framework for MMDS and ITFS stations to support deployment of advanced two-way wireless broadband services. In reply to comments filed during the initial NPRM comment period, ComSpec submits the following:

Reconfiguration of the 2500 - 2690 MHz Band: ComSpec continues to support the Coalition Proposal for division of the band into three segments with flexible use of the two 6 MHz-wide transition bands.

Utilization of Unassigned ITFS Spectrum: Because of our concern for interference issues and the problems of conflict resolution between licensed and unlicensed operations, ComSpec continues to recommend a uniform standard of licensed-only operation in this spectrum.

Conversion of Site-By-Site Licenses of MDS and ITFS Incumbents to Geographic Service Areas:

In our initial Comments, ComSpec noted concerns regarding the boundary calculation when converting existing circular Protected Service Boundaries into Geographic Service Areas ("GSA") by splitting the overlapping areas common between circular area boundaries.

This problem also was recognized and addressed in the Comments filed by WCA, NIA and CTN¹. The approach recommended by WCA, NIA and CTN utilizes great ellipses rather than straight lines in calculating the boundary splitting the overlapping circular boundaries. This approach provides an acceptable standard for calculating the GSA boundaries and should be adopted by the Commission.

Revised Technical Rules To Enhance Licensee Flexibility, Protect Incumbent Operations and Support Mobile Operations: ComSpec believes the Coalition Proposal will encourage the most efficient deployment of advanced wireless broadband services to the public. The Commission is urged to incorporate the Coalition Proposal into the new Rules for the Instructional Television Fixed Service and the Multipoint Distribution Service.

Respectfully submitted,

ComSpec Corporation

By: 

David R. Hollowell
President
822 North Elm Street
Greensboro, NC 27401-1538

22 October 2003

¹See Comments of WCA, NIA and CTN, WT Docket No. 03-66, RM-10586 (filed 8 September 2003) at page 58, footnote 115.