



California Amplifier

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VIA ELECTRONIC FILING

Madeline H. Dortch
Secretary
Federal Communications Commission
Washington, DC 20554

Re: Amendment of Parts 1, 21, 73, 74 and 101 of the 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 – WT Docket No. 03-66

Dear Ms. Dortch:

California Amplifier was involved in extensive work with other WCA members on the formulation of technical recommendations on rewriting the rules for use of MMDS / ITFS spectrum for next generation broadband wireless services. We spent in excess of 100 man-hours in feasibility studies on various configurations of CPE, in order to balance the need for performance and low cost. Given California Amplifier's history as a leading supplier of CPE equipment to the MMDS / ITFS video distribution industry and more recently the broadband data industry, we felt our contribution was based on sound principles, backed by our commitment on ability to develop and deliver products that meet the recommended CPE and spectrum usage rules.

We believe that the recommended rules have the following benefits:

1. Allow flexible use of various vendors' equipment in UBS and LBS, allowing market forces to determine an eventual standard and final band usage plan.
2. Allow existing ITFS services to be migrated to MBS, with sufficient protection to facilitate continued use of the spectrum for its intended purpose.
3. Substantially reduce some of the potential interference problems that were not thoroughly investigated by similar European studies addressing usage of TDD and FDD systems in adjacent bands.
4. Allow manufacturers to develop and market cost-effective CPE and base station equipment necessary to allow services to flourish.

Additionally, I want to point out that one of the major assumptions in protection of MBS ITFS service from interference caused by cellular deployment in LBS and UBS revolved around standardization of the MBS bandplan. This allowed the standardization of a special downconverter that was able to meet the technical



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requirements put forth by the ITFS community, while still remaining relatively cost-effective. Without such standardization, the cost of such a downconverter would greatly increase.

Rather than repeating a lot of technical detail surrounding the decisions that were made on band plan selection, equipment deployment models and equipment spectral emissions masks recommendations, suffice it to say that the major equipment suppliers and spectrum users from the MMDS / ITFS industry and key equipment suppliers from the PCS base station and handset industry participated to develop a mutually agreeable set of specifications that are included in the recommendation. A lot of thorough technical diligence went into each decision, including those involving manufacturability of cost-effective equipment, minimizing interference, licensing of specific markets and ease of use of the spectrum by license holders. I believe that the proposed set of rules will lead to usable spectrum for the intended purposes of deploying competitive broadband services, while protecting existing video services.

Thank you very much for considering my comments in support of the proposed rules changes.

Sincerely,

/s/ Kris Kelkar

Kris Kelkar
Senior Vice President
California Amplifier, Inc.