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March 18, 2004

By Hand

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, N.W.,
Washington, DC 20554

Re: ET Docket No. 03-254

Dear Madam Secretary:

Transmitted on behalf of SkyBridge L.L.C. ("SkyBridge"), for inclusion in the record in the above-referenced docket, are two documents prepared by Comsearch listing the counties that would qualify as a Growth Zone[1] under the Joint Proposal submitted to the Commission by SkyBridge and the Fixed Wireless Communications Coalition ("FWCC").[2]

The first document, Attachment A, is a copy of the list compiled by Comsearch in early 2000 of the counties that would qualify as a Growth Zone based on 1998 data. That list was submitted by SkyBridge in ET Docket No. 98-206, the

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1 *See Notice of Proposed Rulemaking*, FCC 03-318 (released December 23, 2003) (*"NPRM"*), at ¶ 3.

2 *See* Joint Comments of the Fixed Wireless Communications Coalition and SkyBridge L.L.C. (filed March 3, 2004)

proceeding that first examined these issues.[3] Attachment B is an updated list, also prepared by Comsearch, based on 2003 data.

If there are any questions regarding this matter, please contact the undersigned.

Respectfully submitted,

Jeffrey H. Olson
Attorney for SkyBridge L.L.C.

Attachments

[3] *See* Comments of SkyBridge on FWCC/SkyBridge Proposal (ET Docket No. 98-206, filed January 12, 2000).

LIST OF COUNTIES QUALIFYING AS FS GROWTH ZONES BASED ON 1998 DATABASE

	State	County	No. Frequencies
1	CA	LOS ANGELES	472
2	CA	RIVERSIDE	287
3	CA	ORANGE	226
4	AZ	MARICOPA	163
5	CA	SAN BERNARDINO	145
6	NY	NEW YORK	128
7	IL	COOK	106
8	CA	MENDOCINO	94
9	CA	ALAMEDA	92
10	UT	SALT LAKE	91
11	WI	WAUKESHA	89
12	CA	SAN DIEGO	88
13	MI	OAKLAND	85
14	NY	ONONDAGA	81
15	CA	CONTRA COSTA	78
16	NJ	SUSSEX	78
17	PA	PHILADELPHIA	78
18	KY	PIKE	77
19	TX	DALLAS	75
20	NY	SUFFOLK	72
21	MA	MIDDLESEX	68
22	WA	KING	67
23	CA	SANTA CLARA	66
24	WY	PARK	65
25	AZ	PIMA	65
26	CA	HUMBOLDT	64
27	WA	YAKIMA	64
28	MI	WAYNE	62
29	GA	FULTON	61
30	PA	ALLEGHENY	61
31	CA	VENTURA	59
32	OK	OKLAHOMA	59
33	CA	EL DORADO	58
34	CA	SONOMA	57
35	CA	SANTA BARBARA	55
36	CA	MARIN	54
37	HI	HONOLULU	54
38	WY	SWEETWATER	52
39	WA	GRAYS HARBOR	52
40	NJ	ESSEX	50
41	AZ	GILA	49
42	WY	CARBON	49
43	CA	KERN	48
44	CA	TEHAMA	48
45	CA	SACRAMENTO	48
46	TX	HARRIS	47
47	WI	DANE	46
48	PA	DAUPHIN	44
49	AZ	COCONINO	42
50	AK	FAIRBANKS NORTH STAR BOROUGH	42
51	AZ	YUMA	41
52	CA	SAN FRANCISCO	41
53	NV	CHURCHILL	41
54	WA	OKANOGAN	40
55	NJ	HUDSON	40
56	VA	ALEXANDRIA CITY	40
57	DC	DISTRICT OF COLUMBIA	40

58	NH	HILLSBOROUGH	39
59	WA	SPOKANE	39
60	CO	EL PASO	39
61	ID	BANNOCK	38
62	FL	DADE	38
63	WI	JEFFERSON	38
64	TX	TARRANT	38
65	AZ	COCHISE	37
66	CA	MONTEREY	37
67	WA	CLALLAM	36
68	MI	VAN BUREN	36
69	IL	DU PAGE	36
70	NV	CLARK	36
71	WA	PIERCE	34
72	OR	KLAMATH	34
73	CA	SOLANO	34
74	AK	JUNEAU BOROUGH	34
75	CA	TUOLUMNE	33
76	NM	BERNALILLO	33
77	NH	ROCKINGHAM	33
78	OR	MULTNOMAH	33
79	VA	FAIRFAX	33
80	NJ	MONMOUTH	33
81	PA	ERIE	32
82	AZ	MOHAVE	32
83	ID	BONNER	32
84	OR	LANE	32
85	WI	MARATHON	32
86	CA	MARIPOSA	32
87	CO	DENVER	32
88	UT	BOX ELDER	31
89	PA	BLAIR	31
90	PA	LUZERNE	31
91	GA	DE KALB	31
92	AK	ANCHORAGE BOROUGH	30
93	HI	HAWAII	30
94	IL	LAKE	30
95	WA	CHELAN	30

List of Counties Qualifying as FS Growth Zones
10.7 – 11.7 GHz
Based on 2003 Database

Rank	State	County	# of Freqs
1	Arizona	Maricopa	279
2	California	Los Angeles	261
3	California	Riverside	208
4	California	San Bernardino	170
5	Illinois	Cook	163
6	California	San Diego	137
7	Hawaii	Honolulu	123
8	Utah	Salt Lake	101
9	California	Kern	100
10	California	Mendocino	98
11	California	Humboldt	97
12	California	Contra Costa	95
13	New York	New York	85
14	Pennsylvania	Allegheny	81
15	Washington	King	80
16	Arizona	Gila	71
17	California	Marin	69
18	Washington	Yakima	69
19	Wyoming	Park	68
20	Texas	Tarrant	66
21	California	Santa Clara	64
22	Virginia	Virginia Beach	64
23	Florida	Miami-Dade	62
24	California	Plumas	59
25	Washington	Spokane	58
26	Wyoming	Sweetwater	57
27	Alaska	Anchorage	56
28	Texas	Harris	56
29	California	Sonoma	55
30	Alaska	Juneau	54
31	Washington	Snohomish	54
32	California	Alameda	53
33	Oregon	Umatilla	53
34	California	Mariposa	52
35	Georgia	Fulton	52
36	Illinois	DuPage	52
37	New York	Onondaga	52
38	Washington	Okanogan	51
39	California	Lake	50
40	Massachusetts	Dukes	50
41	Arizona	Pima	49
42	California	Orange	49
43	Massachusetts	Middlesex	48
44	Idaho	Bannock	47
45	Texas	Dallas	47
46	California	Ventura	45
47	California	Fresno	44
48	California	Monterey	44
49	Arizona	Coconino	43
50	Arizona	Mohave	43

List of Counties Qualifying as FS Growth Zones
10.7 – 11.7 GHz
Based on 2003 Database

51	Arizona	Yuma	43
52	California	Sacramento	43
53	New Mexico	Bernalillo	43
54	California	Santa Barbara	42
55	Colorado	El Paso	42
56	Michigan	Oakland	42
57	California	San Mateo	41
58	Washington	Grays Harbor	40
59	Washington	Kitsap	40
60	Massachusetts	Suffolk	38
61	Pennsylvania	Cumberland	38
62	Puerto Rico	Caguas	38
63	California	El Dorado	36
64	California	San Francisco	36
65	Virginia	Henrico	36
66	Wyoming	Teton	36
67	Idaho	Kootenai	35
68	Kentucky	Pike	35
69	Washington	Clallam	35
70	Alaska	Fairbanks North Star	34
71	Indiana	Marion	34
72	Nevada	Clark	34
73	Oregon	Lane	34
74	Washington	Benton	34
75	Washington	Kittitas	34
76	Wyoming	Natrona	34
77	California	Shasta	33
78	California	Trinity	32
79	Hawaii	Hawaii	32
80	Michigan	Wayne	32
81	New Jersey	Somerset	32
82	Utah	Washington	32
83	Wisconsin	Dane	32
84	Utah	Daggett	31
85	Washington	Pierce	31
86	California	San Luis Obispo	30
87	California	Tulare	30
88	Colorado	Arapahoe	30
89	New Mexico	Santa Fe	30
90	Ohio	Cuyahoga	30
91	Washington	Chelan	30