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June 16, 2004

VIA ELECTRONIC SUBMISSION

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., SW
Washington, D.C. 20554

Re: Notice of *ex parte* Presentation, WT Docket No. 02-146; Comsearch.

Dear Secretary Dortch:

This is to notify you that on June 15, 2004, representatives of Comsearch, a division of Andrew Corporation, met with staff of the FCC's Wireless Telecommunications Bureau and the National Telecommunications and Information Administration (NTIA). The purpose of the meeting was to discuss Comsearch's proposal to develop and manage an independent database of registrations in the 70 – 90 GHz bands. FCC staff attending the presentation were Sandra Danner, Steve Buenzow, Gerrardo Mejia, Pat Rinn, and Judy Kassakatis. Comsearch was represented by Chris Hardy, Joe Marzin, Will Perkins, Brian Downs and Nilanjan Sengupta. NTIA participants were Roger Clark, Sky Owens, Steve Litts, Mike Doolan, and Tom Woods. In our attached written presentation and in the discussion at the meeting, we made reference to the Petition for Reconsideration filed by the Wireless Communications Association International by supporting the concept of up-front interference analysis as an integral part of the registration process.

In accordance with Section 1.49(f) of the Commission's Rules, this notice is being filed in electronic format for inclusion in the record of the above-referenced docket.

Sincerely,

Christopher R. Hardy
Vice President and General Manager
Comsearch



COMSEARCH[®]

**Database Manager for
Link Registrations in the
70 – 90 GHz Bands**

June 15, 2004

Comsearch Qualifications

- Spectrum Management & Engineering Services company since 1977
- Maintain microwave, MAS, WMTS, UTAM, & satellite earth station databases
- Develop web-based software & database applications
 - ULS Express
 - MAS Express
 - Interactive Solutions
- Provide web-based access to our engineering analysis tools and databases
- Actively participate in WCA “Over 60 GHz” committee that drafted the 70 – 90 GHz Path Coordination Guide
- Maintain WMTS registration database for ASHE
- Extensive working knowledge of FCC / NTIA band sharing issues

Points for Successful Registration Process

- Upfront interference harmonization
- Single master database for commercial links – easier implementation, maintenance, data warehousing and reporting
- Efficient data exchange and de-confliction with NTIA
- Non-discriminatory process
- Database Manager experienced in microwave systems and interference avoidance
- Database Manager experienced in development of commercial web-based software and directly-related database applications



System Design & Data Sharing

- Developed many web-based and stand-alone software products for spectrum management and wireless planning
 - ULS Express, iQ.Link, MAS Express, iQ.Clear, Interactive Solutions
- SW development adheres to end-to-end SDLC
 - Requirements, prototype, design, deployment, test, etc.
- Know many SW architectures, languages, & databases
 - J2EE, WebLogic, Sybase, Oracle, MS Access
- Provide ease of data sharing and downloads
 - Web access to customer data and information databases
 - Automated electronic distribution of PCN data for freq. coordination
 - FCC ULS data regularly downloaded with daily updates
 - ASR data downloaded weekly
 - Form 601 transferred via FCC Electronic Batch Format (EBF)

Network Security

- Checkpoint Firewall System
- Web servers and E-mail relays on two separate “DMZ zones” (isolated inbound internet)
- Databases on backend server in internal high security zone
- SSH Web Security certificates with 128-bit encryption
- 3 DES Secure-Client VPN
- Antivirus software on all servers and PCs
- Secure Data Center via Card/Key with Alarms
- Security Camera in Data Center
- 24/7 onsite staff with automated remote environment monitors

Software Security

- Login accounts require 6 character passwords
- Passwords encrypted and stored in high security zone
- Auto time-lock for unsuccessful login attempts
- WebLogic application server features – 128-bit encryption, 3DES, HTTPS
- Permissions to applications set for groups & individuals

IT & Staffing Redundancies

- Incremental backups performed nightly
- Full backups weekly with quarterly and annual archives sent offsite
- Source control system to revert to previous SW release
- Multiple servers with component spares
- Full-time IT, database, and engineering staff

Reporting Capabilities

- Link query capabilities by: call sign, site name, licensee, coordinates with radius, FCC file no., ASR no., etc.
- Queries can be combined into reports downloaded in raw .csv format or customized report formats
- History tables used to track database transactions



Q & A

