

Before the
Federal Communications Commission
Washington DC 20554

In the Matter of

Rechannelization of the 17.7-19.7 GHz
Frequency Band for fixed Microwave Services
under Part 101 of the Commission's Rules

WT Docket No. 04-143

COMMENTS OF ALCATEL

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August 6, 2004

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Pursuant to Section 1.415 of the Commission's Rules, Alcatel files these Comments in response to the Notice in the above-captioned docket.¹ Alcatel manufactures communications equipment, including microwave radio products, and provides communications solutions to a wide range of commercial and government users.

Alcatel is a member of the Fixed Wireless Communications Coalition (FWCC) and fully supports the FWCC comments in this proceeding.

Alcatel takes this opportunity to emphasize that the availability of the terrestrial fixed services ("FS") depends on providing a system design that matches the requirements of the users. In this proceeding the Commission recognizes the need to complement the existing table of frequencies and bandwidths with channels of narrower bandwidth.² Alcatel fully supports this approach as a way to promote more efficient use of the 18 GHz band.

There are two proposals in the NPRM proceeding that Alcatel does not support. The first is the designation of a contiguous 500 MHz block of one-way spectrum from 17.8-18.3 GHz for

¹ *Rechannelization of the 17.7-19.7 GHz Frequency Band*, 19 FCC Rcd 7260 (2000) ("Notice").

² Notice at paras. 6-7.

use by multichannel video programming distributors ("MVPDs").³ As the Commission pointed out in a previous Report and Order on Part 78 eligibility, MVPDs and private cable operators ("PCOs") typically use a hub-and-spoke architecture.⁴ The deployment of one-way links in this manner will effectively block the use of the entire 18 GHz band (*i.e.*, both the low band and high band) for two-way FS use in the vicinity of MVPDs systems. The overlap of MVDP service with the existing and proposed narrowband channels will deny FS users the flexibility to deploy their more efficient two-way links. We note the MVPDs and PCOs were made eligible to use the 12 GHz CARS band at 12.7-13.2 GHz band,⁵ an alternate band that is not available to FS users.

The second proposal that Alcatel does not support is the new channel pairing for 220 MHz bandwidth channels.⁶ The proposed pairing of 17810 MHz with 19590 MHz would effectively block the use of narrower channels for two-way links within the entire FS portion of the 18 GHz band. The 17810 MHz channel would occupy the lower half of the low band (*i.e.*, 17.7-18.14 GHz) and the 19590 MHz channel would occupy the upper half of the high band (*i.e.*, 19.3-19.7 GHz). A license for the proposed 220 MHz channel pair would leave no designated channel pairs for narrower bandwidth applications, and so would result in inefficient use of the 18 GHz band for FS applications. Alcatel believes these channels are no longer needed and respectfully requests that the Commission eliminate the 220 MHz bandwidth channels and not accept any new applications for their use.

³ *Id.* at 2.

⁴ *Eligibility Requirements in Part 78 Regarding 12 GHz Cable Television Relay Service*, 17 FCC Rcd 9930 at para. 6 (2002).

⁵ *Id.* at para. 9.

CONCLUSION

For the reasons set out above, the Commission should decline to expand 18 GHz spectrum available for final video links, and abandon its proposal for a new 220 MHz pair.

Respectfully submitted,

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⁶ Notice at para. 8 & 47 C.F.R. Sec. 101.147(r)(ix)(13) (proposed).

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