



August 24, 2004

**Filed Electronically**

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

**RE: Ex Parte in Allocations and Service Rules for the 71-76 GHz, 81-86 GHz and 92-95 GHz Bands, WT Docket No. 02-146**

Dear Ms. Dortch:

On August 24, 2004, Cisco Systems, Inc. and others members of the Wireless Communications Association's Above 60 GHz Committee met with Commission staff on the above-captioned docket. Representing Cisco were myself, Dave Stephenson, and Eldad Perahia. Other industry representatives were Doug Lockie of Gigabeam, Joe Marzin of Comsearch, Jay Lawrence of Loea Corp., and Tom Cohen of The KDW Group, representing Loea. Commission staff members in attendance were: Steve Buenzow, Mary Shultz, Patrick Forster, Michael Pollak, Geraldo Majia, David Hu, and Peter Daronco.

Cisco presented the attached material, seeking modified rules for the operation of transmitters at 71-76 GHz and 81-86 GHz. The presentation provides background information to illustrate how the WCA developed the unopposed rules changes that it is advancing on reconsideration. The discussion at the meeting focused on:

- (1) the proposed flexible power/gain tradeoff rule to accommodate smaller antennas and lower cost products that reflect a range of business plans and meet the diverse needs of customers,
- (2) the need to mandate automatic transmit power control for links with EIRP greater than 23 dBW to reduce unnecessary interference,
- (3) the need to adopt a power spectral density limit at an upper limit of 150 mW/100MHz to ensure availability of the band for fiber-equivalent links,
- (4) and the proposed repeal of the rule requiring 1 bps/Hz loading requirement, a rule that if left in place will require higher-order, more complex modulation schemes that will hamper development of the band.

Also included in the presentation is information on the proposed interference protection criteria of a maximum of 36 dB, an issue which was not discussed but which the industry believes is necessary in order to balance link deployment density while allowing a range of device types.

We also note that this presentation as filed with the Secretary's office contains a corrected slide 24. The first sub-bullet on the page has been corrected to read "Minimum ATPC dynamic range = maximum(0, EIRPdBW-23)"

Sincerely,

***Mary L. Brown***

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CC: Steve Buenzow, Mary Shultz