Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Part 90	)	WP Docket No. 07-100
of the Commission's Rules	)	

To: The Commission

Reply Comments of the National Spectrum Management Association

Comments of The National Public Safety Telecommunications Council, Harris Corporation, and APCO opposed the use of Part 101 Coordination for primary, permanent fixed stations in the 4940-4990 MHz band. NSMA hereby respectfully submits its Reply Comments to address concerns about Part 101 Coordination expressed in these Comments.

Fundamentally, Part 101 Coordination is a notification and response process where the technical parameters of a proposed system are submitted to the licensees that are potentially affected for their approval. The coordination takes place among the licensees and does not involve FCC-certified coordinators. Where a regional plan exists, the licensees may be expected to implement the plan in their proposals and responses; however, the existence of a plan or an effective regional planning committee (RPC) would not be a prerequisite for coordination to take place.

In Part 101 Coordination, the interference criteria used are those deemed appropriate by the parties involved and may be based on good engineering practice as applicable to the band. Part 101 Coordination generally requires a 30 day notification period but can be completed much more quickly or even verbally if the parties agree.

NPSTC and Harris point out that the technical parameters of 4940-4990 MHz band systems are somewhat different than the typical point-to-point microwave links licensed under Part 101. Although it is true that parameters such as antenna patterns of links in the 4940-4990 MHz band are different, this does not mean that the Part 101 coordination procedures are inapplicable. Where directional antennas are used to form point-to-point links, existing methods of direct interference calculations could be used even if the antennas are lower in gain and larger in beamwidth. Obviously, to the extent the antenna patterns are worse, the band might support a lower degree of frequency re-use. NSMA agrees, however, that the traditional direct interference calculations intending to limit receiver threshold degradation to 1 dB or less might not be applicable for mesh links formed between sector or omnidirectional antennas. Overlapping sector or omni coverage areas would usually be predicted to involve interference under such an approach and would require other methods or sharing agreements to resolve.

Respectfully submitted,

NATIONAL SPECTRUM MANAGEMENT ASSOCIATION

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