

**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

**Comments of the National
Spectrum Management Association**

The National Spectrum Management Association (“NSMA”) hereby submits its comments in response to the Commission’s Further Notice of Proposed Rule Making (“*FNPRM*”) in the above captioned proceeding. NSMA is a voluntary association of individuals involved in the spectrum management profession. NSMA’s goal is to promote rational spectrum policy through consensus views formulated by representatives of diverse segments of the wireless communications industry.

In the *FNPRM* the Commission proposes to require coordination using the procedures of Section 101.103(d) (“Part 101 Coordination”) for all primary fixed point-to-point and point-to-multipoint systems in the 4940-4990 MHz band. NSMA agrees that Part 101 Coordination could be effective for fixed links that use directional antennas to interconnect 4.9 GHz base stations or backhaul 4.9 GHz network traffic. For such dedicated point-to-point links the Part 101 frequency coordination process allows a high degree of frequency reuse while avoiding harmful interference. Many public safety organizations are licensees of fixed microwave spectrum under Part 101 and we believe

that these users have confidence in the value of the prior coordination process for these systems.

We do not believe that Part 101 Coordination would be effective or necessary for systems that use ad hoc mesh interconnections to relay traffic among fixed stations and mobile units using the sector or omnidirectional antennas of the network. Systems that are designed to use such mesh interconnections may be expected to manage interference among the mesh links and mobile links. Potential interference among multiple networks would have to be addressed through the regional plan and cooperation among the licensees.

To the extent fixed links using directional antennas are used in an area, the potential for interference between these links and the area-wide network coverage would have to be addressed. We anticipate that the 4940-4990 MHz band users would prioritize temporary and mobile usage vs. permanent fixed usage among themselves¹ and we believe this would often mean use of an agreed channel plan to segregate a set-aside of fixed link spectrum from spectrum for incident response. However, the Commission properly leaves such planning to the users.

The Commission has proposed to require Part 101 Coordination only for *primary* permanent fixed systems. Yet site-by-site licensing is to be required for all permanent fixed systems, whether primary or secondary. Secondary permanent fixed systems are potential interference sources and this interference potential is most appropriately

¹ See §90.1209(b) and §90.1211.

addressed in the coordination process. Therefore NSMA recommends that coordination should be required for all permanent fixed systems whether primary or secondary.

Respectfully submitted,

**NATIONAL SPECTRUM
MANAGEMENT ASSOCIATION**

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