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December 6, 2006

Mr. John Kennedy
Office of Engineering and Technology
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Phoenix Urban and Country Communications, Inc., File No. 0323-EX-PL-2006; Response to Request for More Information (Reference No. 4616)

Dear Mr. Kennedy:

I am responding to your request for additional information concerning the above-referenced experimental application of Phoenix Urban and Country Communications, Inc. ("PUCC") as specified in your e-mail dated October 27, 2006. The emission designator for the radio transceivers is 20M0D7W. In addition, attached to this letter is a chart reflecting a minimum separation distance of more than 150 kilometers from the nearest "grandfathered" earth stations (with one minor exception discussed therein). Thus, no additional coordination is necessary with regard to any of these earth stations but one. See, *Wireless Operations in the 3650-3700 MHz Band*, FCC 05-56, released March 16, 2005 at ¶¶ 64 and 65.

I will be attempting to input the foregoing information into PUCC's application, but to the extent that effort is unsuccessful, consider this letter as an amendment to the application to furnish this supplemental information. In addition, following is more detailed information on the equipment PUCC plans to deploy in this experimental operation:

| Manufacturer | Model Number | No. Of Units | Experimental |
|---------------------|---------------------|---------------------|---------------------|
| Aperto Networks | PacketMAX 3000 | 5 | No |
| Aperto Networks | PacketMAX 100 | 150 | No |

The base stations (PacketMAX 3000) will operate using a non-directional antenna and operate at 1.0 Watt output power and ERP. The subscriber units (PacketMAX 100), will utilize a directional antenna with a beamwidth of 20 degrees, and operate at 0.1 Watts output power and 4.0 Watts ERP. The antennas for both the base stations and subscriber

units will be attached to existing buildings/structures, and will in no event extend more than six meters above those existing buildings/structures.

Please contact the undersigned if you need any additional information or have any questions with regard to this experimental application. Thank you in advance for your help in this matter.

Sincerely,

/s/

Stephen L. Goodman
Counsel for PUCC

Compliance with 150 km Minimum Separation Distance to Grandfathered Earth Stations

| <u>Application Site</u> | <u>Latitude</u> | <u>Longitude</u> | <u>Nearest FSS Station</u> | <u>Latitude</u> | <u>Longitude</u> | <u>Kilometers</u> |
|-------------------------|-----------------|------------------|----------------------------|-----------------|------------------|-------------------|
| Baton Rouge, LA | 30.23.45N | 91.03.02 | Pascagoula, MS (Fed) | 30.22N | 88.29W | 244.8 |
| Chardon, Oh | 41.34.29N | 81.12.02W | Albright, WV | 39.34.07N | 79.34.45W | 260.8 |
| Dayton, Oh | 39.48.53N | 84.16.27W | Etam, WV | 39.16.48N | 79.44.14W | 392 |
| El Paso, TX | 31.47.24N | 106.20.03W | Desoto, TX | 32.37.48N | 96.50.32W | 892.8 |
| Greensboro, NC | 36.09.04N | 79.50.09W | West Jefferson, NC | 36.25.50N | 81.23.45W | 143.4 |

The proposed operations in Greensboro, NC are approximately 143.4 kilometers from the nearest Fixed Earth Station (in West Jefferson, NC), slightly below (by about 4 miles) the 150 Kilometer minimum separation distance that triggers coordination specified in the Commission's decision allocating the 3650-3700 MHz band for unlicensed services. PUCC will therefore coordinate with the earth station licensee before commencing operations in Greensboro, or only deploy units more than 150 kilometers from the West Jefferson earth station.