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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. 0325-EX-PL-2006; Response to Request for More Information (Reference No. 4618)

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

Application Site	Latitude	Longitude	Nearest FSS Station	Latitude	Longitude	Kilometers
Rochester, NY	43.10.08N	77.41.59W	Catawissa, PA	40.53.39N	76.26.21W	272
San Jose, CA	37.25.00N	121.51.46W	Livermore	37.45.40N	121.47.53W	38.4
Los Olivios, CA	34.56.39N	119.55.41W	Somis	34.19.31N	118.359.41W	110.4
Wilbraham, MA	42.07.31N	72.25.52W	Hauppauge, NY	40.49.15N	73.15.48W	160
Syracuse, NY	43.02.52N	76.08.43W	Hawley, PA	41.27.51N	75.07.48W	193.6

The proposed operations in San Jose and Los Olivios less than 150 kilometers from the nearest Fixed Earth Stations (in Livermore and Somis), thus triggering coordination as specified in the Commission's decision allocating the 3650-3700 MHz band for unlicensed services. PUCG will therefore coordinate with the earth station licensee before commencing operations in San Jose or Los Olivios.