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September 25, 1996

Via Hand Delivery

Mr. Carl Huie
Experimental Licensing Branch
Office of Engineering and Technology
Federal Communications Commission
Room 230
2000 M Street, N.W.
Washington, D.C. 20554

Re: Amendment of Experimental Application of WinStar Wireless, Inc.:
File No. 5260-EX-ML-96

Dear Mr. Huie:

Following our telephone conversation last week, WinStar Wireless, Inc. ("WinStar") desires to amend its pending experimental application (File No. 5260-EX-ML-96) to separate out its request to conduct tests in the 31 GHz band, from its request to modify its current experimental license for operations in the 38 GHz band (Call Sign KS2XFT) to include authority to conduct limited market studies. In its application filed last April, WinStar sought authority for both activities in a single application. In order to segregate these two requests, the current application should be deemed a new application (rather than a modification) and is hereby being amended so that it is only seeking authority to operate in the 31 GHz band. In addition, enclosed is a copy of a separate application being filed concurrently in Pittsburgh that is seeking a modification of the 38 GHz license to add authority to conduct limited market studies. Finally, WinStar is also providing supplemental information with regard to its request to use the 31 GHz band.

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WinStar is attempting to gauge the suitability of the 31 GHz band for the types of services now being offered by WinStar, namely point-to-point links for various applications. In light of the different propagation characteristics and the different interference environment in the 31 GHz band (vis-a-vis the 38 GHz band where WinStar now operates), WinStar desires to determine whether the 31 GHz band can be used reliably to provide a wide variety of important point-to-point services, including local networks and alternative access services for interexchange carriers, competitive access providers and end users. WinStar's 38 GHz capacity has begun to be used for, inter alia, basic and advanced data transmissions, redundancy for customers desiring a high degree of reliability, "bypass" of the local exchange carrier, interconnection of customer sites, and substitute capacity in case of damage to the landline networks from natural or man-made disasters. In sum, WinStar is seeking to determine whether the 31 GHz band can be developed as a substitute or complement to the 38 GHz band.

WinStar thus seeks experimental authority to conduct tests in the 31 GHz band as described more fully in its application filed in April, including the ability to conduct limited market studies in the 31 GHz band. I trust that this additional information, in conjunction with the bifurcation of the application filed in April, will allow you to grant WinStar's requests expeditiously. Please feel free to contact me if you require any additional information. Thank you in advance for your prompt attention to this matter.

Sincerely,


Stephen L. Goodman

Enclosure