Wireless Strategies Znc.
PO Box 2500 Carmel Valley, CA 93924. Tel. 831 659 5618 Fax. 831 659 5634

May 6,2008

Marlene H. Dortch, Secretary
Federal communications Commission
Office of the Secretary
9300 East Hampton Drive
Capital Heights, MD 20743

Dear Madam Secretary:

Please find enclosed an original and four copies of Wireless Strategies Inc. (WSI) opposition to the objection filed by Verizon and Verizon Wireless to WSI's Experimental License Application 0051-EX-PL-2008.

Sincerely

Michael Mulcay, Chairman
Wireless Strategies Inc.

Wireless Strategies Inc.

PO **Box** 2500 **Carmel Valley,** CA 93924. **Tel.** 831 659 5618 **Fax.** 831 659 5634

May 6, 2008

James R. Burtle, Chief
Experimental Licensing Branch
Office of Engineering and Technology
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Wireless Strategies Inc. Experimental License Application
File No. 0051-EX-PL-2008

Dear Mr. Burtle:

Wireless Strategies Inc. (WSI) submits this reply to Verizon's Objection to WSI's Experimental License Application 0051-EX-PL-2008.

General

For small and start-up companies, such as WSI, to grow they must provide the public with innovative and superior products and services at lower prices than large companies who have established large market shares.

On the other hand, Verizon is a large established company with significant market share and clearly has a vested interest in maintaining the status quo by restricting competition by stifling innovation. As experimentation is part of the innovative process, attempting to stifle experimentation is clearly an attempt to stifle innovation.

Procedural Matters

WSI maintains that it is in full compliance with Rule 5.55(c) while Verizon contends it is not. It would seem that the public interest is not served by delaying experimentation which has the potential to provide the public with new innovative services and lower prices while debating diminutive procedural points.

Technical Matters

Verizon chooses not to address the facts regarding their professed fear of potential harmful interference. The facts are:

i. The proposed experiments will be conducted on one licensed[1] frequency pair with emissions below those authorized. Therefore, they will not cause any harmful interference.

1. Licenses WQGH695, WQGH696 and WQGH697.

ii. A computer analysis, by a frequency coordinator or engineer, to determine the maximum level of radiation from Distributed Radiating Elements (DREs) that will not cause interference, and which have not even been deployed, cannot be a source of interference to any existing or proposed microwave paths,

iii. The deployment and operation of DREs at the identified locations and at power levels at or below the maximum power level, which does not cause interference, cannot be a source of harmful interference.

For Verizon to assert that the above three items could potentially interfere with any Verizon paths or any other paths is nonsense and is an attempt to stifle innovation.

It is well known by the industry, that in order for a frequency coordinator or engineer to conduct an interference analysis, they must be provided with the source of interference, the type of interference, its magnitude at all angles around the source etc. This therefore is what WSI had proposed. However, to placate Verizon WSI has listed the factors in Exhibit 1. In addition, WSI will ask the frequency coordinator to notify all licensees, permittees and applicants with coordinated proposals of the result of the non-interference studies.

It is clearly in the public interest to investigate ways to more effectively use microwave spectrum, a finite national resource. Therefore, in the spirit of promoting the art of the more effective use of spectrum WSI will email a copy of the Non-Interference Matrix to any interest party who requests a copy so they can perform independent studies with any DRE radiator gain of their choosing and at any location of their choosing to determine "The Maximum DRE Output Power that will Not Cause Harmful Interference."

With the above said, WSI points out to Verizon that Distributed Radiating/Receiving Elements (DREs) of a Smart Antenna only have "Secondary" status in that the Interference arriving at the input of any victim receiver from a DRE (I_{DRE}) must always be less than the coordinated Interference (I) and that the DRE must accept any interference.

The issuing of an experimental license to WSI would be in the public interest and in line with the goals of the Commission, which has consistently promoted the national policy set forth in Section 257 of the Communications Act by enabling industry operators and equipment providers to maximize the efficient use of spectrum and facilitate innovative services and product offerings that are in public and national interest

Therefore, for the above reasons, WSI respectfully requests the Commission to grant the experimental license.

Sincerely,

Michael Mulcay, Chairman
Wireless Strategies Inc.

cc: Lesley V. Owsley
Assistant General Council
VERIZON
1515 North Court House Road
Suite 500
Arlington VA 22201

Donald C. Brittingham
Director, Wireless/Spectrum Policy
VERIZON WIRELESS
1300 Eye Street, N.W.
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Julius P. Knapp, Chief
Office of Engineering Technology
Federal Communications Commission
445 12'' Street SW
Washington, DC 20554

Non-Interference Matrix

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	DRE	1	2	3	....	....	....	....	....	n -3	n -2	n -1	n	
2	Identification Number													
3														
4	Location Coordinates and Center Line (Note 1)													
5	Latitude													
6	Longitude													
7	Ground Elevation AMSL													
8	Radiator Center Line AGL													
9														
10	Frequency													
11														
12	Polarization													
13														
14	Transmitter													
15	Part Number													
16	Stability													
17	Emission Designator													
18														
19	Max Output Power (Note 2)													
20														
21	DRE Radiation Pattern Envelope													
22														
23	DRE Receiving Site													
24	Location Coordinates and Center Line(Note 1)													
25	Latitude													
26	Longitude													
27	Vertical (AMSL)													
28														
29	Note 1. Position location will be within +/-1 second in the horizontal dimensions (latitude and longitude) and +/- 1 meter in the vertical dimension (ground elevation) relative to the													
30	National Reference Spacial Reference System.													
31														
32	Note 2a. Maximum output power at input of the radiator that will not cause harmful interference.													
33	Note 2b. The following DRE related licensed paths will accept interference:													
34														

Exhibit 1