

NEW AMERICA
FOUNDATION

June 4, 2008

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

Re: Application of Wireless Strategies Inc. for an
Experimental License (File No. 0051-EX-PL-2008)

Dear Mr. Burtles:

New America Foundation ("NAF") is writing to urge the Commission grant Wireless Strategies Inc. ("WSI") application for an experimental license allowing it to test and study the performance of distributed antenna systems ("DREs") used with FCC Rule Part 101 operational-fixed microwave radio systems.

The New America Foundation is a nonprofit, post-partisan public policy institute whose purpose is to bring exceptionally promising new voices and new ideas to the fore of our nation's public discourse. The purpose of New America's Wireless Future Program is to promote a more fair and efficient use of the airwaves in order to unlock the full potential of the wireless era.

As the population in the United States increases in size, and more and more businesses rely upon point-to-point microwave radio links for communications, the ability to deploy microwave radios with customary technology decreases. At the same time, the wireless industry is reporting a dramatic increase in the demand for data bits per megahertz per subscriber for new services, making it more important than ever to rapidly bring to market innovative ways to increase the effective and efficient use of point-to-point microwave radio spectrum. Yet radio spectrum, while scarce, can be expanded to meet the ever-increasing demands using innovative engineering techniques. As resolving the problems of spectrum scarcity is one of the highest goals of the FCC, NAF believes that the FCC should take positive and proactive steps to encourage the rapid development, testing and deployment of technologies that make more efficient use of radio spectrum.

The proposed testing by WSI is the type of experimentation and innovation that the FCC should be actively encouraging. The testing will be conducted for the purpose of determining whether this particular DRE can co-exist with existing microwave radio technology, which could provide critical spectrum use efficiencies, increase the

availability of microwave spectrum and reduce the cost of deployment. This experimentation is especially important, as too little has been done to improve the efficiency of microwave radio point-to-point antenna systems since the 1950s. Meanwhile congestion in the microwave frequency bands has been an increasing problem and continues to worsen every year.

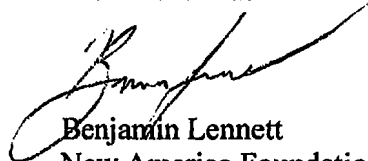
NAF has reviewed the experimental application and WSI's request for declaratory ruling on the concurrent coordination of **DREs** in smart antenna systems. Based upon that review, NAF believes that the WSI's request warrants serious consideration and urges the Commission to provide WSI with an opportunity to provide additional supporting evidence. WSI's proposed experimentation would be essential to demonstrating the viability of the **DREs** systems and provide the Commission with important real world data to make a judicious decision regarding WSI's request for a declaratory ruling. Although, NAF recognizes the importance of protecting licensed users from interference, it is important for the Commission to balance the interests of licensees and not quell innovation by unnecessarily limiting experimentation. Given that the proposed experimentation, as provided in WSI's FCC Form 442, will operate within technical parameters of its existing licensees it would seem that any interference resulting from the **DRE** testing would be kept to acceptable levels for all existing operators.

Demand for spectrum continues to increase, while the supply of this critical communications resource remains static. As a consequence, it becomes critical that we develop new technologies that utilize existing spectrum more efficiently. NAF urges the Commission to support innovation and approve WSI's application for experimental license.

Respectfully submitted,



Sascha Meinrath



Benjamin Lennett

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cc: **Julius P. Knapp**, Chief
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