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June 17, 2008

BY HAND

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

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

Dear Ms. Dortch:

Transmitted herewith for filing with the **Commission** are an original and four copies of a letter **from** Sprint **Nextel** Corporation regarding the above-referenced experimental license application. Please contact me if you have any questions.

Sincerely,



Charles W. Logan

Sprint

Together with NEXTEL

Sprint Nextel  
2000 Edmund Kelly Drive  
Reston, VA 20191  
Office: (703) 433-8124 Fax: (703) 433-4142  
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June 17, 2008

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

**RE:** Informal Comments in Support of  
Wireless **Strategies Inc. Experimental** License Application  
File No. 0051-**EX-PL-2008**

Dear Mr. **Burtles**:

Sprint **Nextel** Corporation (Sprint **Nextel**) encourages the Commission to grant the above-referenced application, filed by Wireless Strategies Inc. ("**WSI**"), with appropriate interference-avoidance conditions.

WSI has stated that the purpose of its experimental license application is to obtain experimental authorization to test newly developed equipment whose parameters meet or exceed the requirements **authorized** in certain existing licenses . . . and to demonstrate that the Distributed Radiating elements (**DREs**) of a Smart Antenna System, operating within the Smart Antenna System's interference contour, can reuse the licensed frequencies without causing harmful interference.<sup>1</sup> Sprint **Nextel**, as a licensee of fixed microwave stations, believes that **WSI's** proposed experiments hold some promise for increased efficiency in the use of fixed microwave spectrum. As Sprint **Nextel** and other carriers expand their deployment of third-generation and fourth-generation wireless services, ready access to broadband **backhaul** links and to economical re-use of fixed microwave spectrum has become increasingly important.

In February 2007, WSI **filed** a Petition for Declaratory Ruling seeking to permit the concurrent coordination of point-to-multipoint microwave links based on **the off-axis** power levels for a main point-to-point microwave link permitted under Part 101.<sup>2</sup> Sprint **Nextel** opposed **WSI's** petition because it lacked sufficient information to assess whether interference would result and generally **generated** more questions about the potential for harmful interference than it answered.<sup>3</sup> At the same time, however, Sprint **Nextel** indicated that more efficient use of the **fixed** point-to-point microwave bands as proposed by WSI warranted further consideration.<sup>4</sup>

<sup>1</sup> WSI, FCC **Form** 442, Technical Submission at 1, File No. **0051-EX-PL-2008** (Feb. 15, 2008).

<sup>2</sup> **WSI** Request for Declaratory Ruling, WTB Docket No. 07-121 (Feb. 27, 2007).

<sup>3</sup> Reply Comments of **Sprint Nextel** Corporation, WTB Docket No. 07-121 (Aug. 20, 2007).

<sup>4</sup> *Id.* at 2

While Sprint **Nextel** remains opposed to a declaratory ruling in favor of **WSI's technology**, Sprint **Nextel** supports granting WSI's application for an experimental license. **WSI's** experimental license application would perform the kind of **research** and testing permitted under section 5.3 (Scope of Service) of the Commission's rules.<sup>5</sup> WSI would use the well-established Part 101 **frequency** coordination procedures, as has been **suggested** by AT&T as well as Verizon and **Verizon** Wireless. Specifically, WSI indicated that it would follow the Part 101 frequency coordination rules for the specific implementation of its experimentation. In particular, WSI has stated that it **will** contract with a frequency coordinator to ensure that the interference received at any existing or proposed victim receiver from any DRE will be less than the interference at any existing or presently proposed victim receiver from WSI's **previously** coordinated licensed paths. In addition, pursuant to section **101.103(d)(2)(ix)**,<sup>7</sup> WSI has said that it will notify the specific proposed DRE operations to parties receiving the original frequency coordination notices along with a determination from the frequency **coordinator** that **WSI's** DRE experimentation will not have an impact on those parties.<sup>8</sup> While not without risk, **WSI's** careful compliance with these interference-protection measures should be sufficient to assure that interference will not occur for purposes of an experimental **license** grant.

So long as the Commission conditions the grant of WSI's experimental license application on the **completion** of frequency coordination that shows no increase in Interference and requires WSI to notify other microwave licensees of the specifics of WSI's DRE experimentation, Sprint **Nextel** supports grant of **WSI's** experimental license application. Experimental testing will help assess the costs and **benefits** of **WSI's** proposed technology.

Regards,

*Richard B. Engelman/cwx*

**Richard B. Engelman**  
Director, Spectrum Resources  
Government Affairs

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<sup>5</sup> 47 C.F.R. 95.3.

<sup>6</sup> Letter from Michael Mulcay, WSI, to James Burtie, OET, at 3 (April 11, 2008).

<sup>7</sup> 47 C.F.R. § 101.103(d)(2)(ix).

<sup>8</sup> Letter from Michael Mulcay, WSI, to James Burtie, OET (May 14, 2008).

### Certificate of Service

I hereby certify that on this **17<sup>th</sup>** day of June, **2008**, I caused copies of the foregoing letter from Richard B. Engelman, Sprint **Nextel** Corporation to be sent by **first-class**, postage paid mail to the following:

|                                                                                                                                                                          |                                                                                                                                                                              |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Julius <b>Knapp</b><br><b>Office</b> of Engineering and Technology<br>Federal Communications Commission<br>445 <b>12<sup>th</sup></b> Street, SW<br>Washington, DC 20554 | Ira <b>Keltz</b><br><b>Office</b> of Engineering and Technology<br>Federal Communications <b>Commission</b><br>445 <b>12<sup>th</sup></b> Street, SW<br>Washington, DC 20554 |
| Michael Mulcay<br>Wireless Strategies, Inc.<br>140 Western Maryland Parkway<br>P.O. Box 3139<br>Hagerstown, MD 21742                                                     | James J.R. Talbot<br><b>AT&amp;T Services, Inc.</b><br>1120 <b>20<sup>th</sup></b> Street, NW<br>Washington, DC 20036                                                        |
| Mitchell <b>Lazarus</b><br>Fletcher, Heald & <b>Hildreth, PLC</b><br>1300 North <b>17<sup>th</sup></b> Street, <b>11<sup>th</sup></b> Floor<br>Arlington, VA 22209       | Lesley V. Owsiey<br><b>Verizon</b> Communications Inc.<br>1515 North Courthouse Road<br>Suite 500<br>Arlington, VA 22201                                                     |
| Donald C. <b>Brittingham</b><br>Verizon Wireless<br>1300 Eye Street, NW<br>Suite 400 - West<br>Washington, DC 20005                                                      | <b>Benjamin Lennett</b><br>New America Foundation<br>1630 Connecticut Avenue, NW<br><b>7<sup>th</sup></b> Floor<br>Washington, DC 20009                                      |

  
Charles W. Logan