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FILED/ACCEPTED

June 17, 2008

JUN 17 2008

Federal Communications Commission
Office of the Secretary

BY HAND

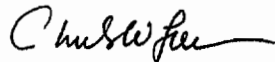
Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

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 Nextel
2001 Edmund-Halley Drive
Reston, VA 20191
Office: (703) 438-8124 Fax: (703) 438-4142
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Federal Communications Commission
Office of the Secretary

Mr. James R. Burtle, Chief
Experimental Licensing Branch
Office of Engineering and Technology
Federal Communications Commission
445 12th 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. Burtle:

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."¹ 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 101.² 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.³ 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.⁴

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

² WSI Request for Declaratory Ruling, WTB Docket No. 07-121 (Feb. 27, 2007).

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

⁴ *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.⁵ 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.⁶ In addition, pursuant to section 101.103(d)(2)(ix),⁷ 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.⁸ 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/cwz

Richard B. Engelman
Director, Spectrum Resources
Government Affairs

⁵ 47 C.F.R. § 5.3.

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

⁷ 47 C.F.R. § 101.103(d)(2)(ix).

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

Certificate of Service

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


Charles W. Logan