



Schwaninger & Associates, P.C. Attorneys at Law

1835 K Street, N.W., Suite 650, Washington, DC 20006

Internet Address - <http://www.sa-lawyers.net>

telephone - (202) 223-8837

facsimile - (202) 659-0071 347-8580

Robert H. Schwaninger
Michael L. Duggs, Jr.
Delaney M. DiStefano
Benjamin J. Acorn
Richard P. Hammer
Admitted in Maryland

Vic Jackson
Interconnection Consultant

September 26, 2000

via Facsimile Only

Federal Communications Commission
Attn: Mr. Huey
Office of Engineering and Technology
445 12th Street, SW
Washington, DC 20554

Re: Attachment to Application for New or Modified Radio Station Authorization
FCC Form 442
File Number 0213-EX-PL-2000
Confirmation Number EL10340

Dear Mr. Huey:

We represent the interests of Zhone Technologies, Inc. On behalf of our client, and pursuant to our discussion of the problems we have experienced with the Commission's electronic application system, we hereby submit the following amendment to the above referenced application. A copy of the blank paper application is attached hereto, and the responses provided below correspond thereto. Although the majority of the information provided below has already been provided online, we below provide an answer to each question on the paper application. We appreciate your assistance regarding the submission of this application.

1. Applicant's Name and Post Office Address

Zhone Technologies, Inc.
6153 State Farm Road
Rohnert Park, California 94928

2. Application for: New Station

3. N/A

15, 407 (2)

4. Particulars of Operation

A	B	C	D	E	F	G
5.25 - 5.35 GHz	250 mW	1 watt	Peak	16QAM	55 mbps	17 MHz
5.725 - 5.825 GHz	250 mW	1 watt	Peak	64QAM	170 mbps	20 MHz
5.925 - 6.425 GHz	250 mW	10 watts	Peak	QPSK	55 dBW	30 MHz
10.70 - 11.70 GHz	250 mW	10 watts	Peak	256QAM	622 mbps	40 MHz

G: The required bandwidth was determined through preliminary engineering studies of the proposed operational parameters of the equipment the applicant proposes to design and test under the authority being applied for in the instant application. The requested bandwidth is in compliance with the Commission's rules.

5. Proposed location of transmitter and transmitting antenna:

- Base and Mobile
- N/A
- 10 mile radius of 6153 State Farm Drive, Rohnert Park, California
 - 38-15-00 North
122-30-00 West

6. Is a directional antenna used?

Yes.

- In un-licensed bands, not to exceed 6.1 degrees. In licensed bands, not to exceed 2 degrees.

b & c) N/A. Both polarities to be used as required.

7. No.

8. No

9. No.

10. The applicant proposes to design, develop and field test microwave transmission devices for the purposes of furthering the development of the nation's wireless communications infrastructure. The Part 15 devices the applicant proposes to design, for the purpose of developing a viable, marketable National Information Infrastructure (NII) system, will provide short-range, high speed wireless digital communications. These devices will support the creation of new wireless local area networks and will facilitate wireless access to the NII. The equipment being designed will not interfere with other radio services, as is consistent with Part 15 of the Commission's rules. The proposed

equipment will offer new opportunities for providing advanced telecommunications services to educational institutions, health care providers, libraries, businesses, and other users. The devices will further the goals set forth in the Telecommunications Act of 1996 of providing advanced telecommunications capabilities to all Americans

11. Two years.
12. No.
13. Experimental.
14. No.
15. No.
16. Corporation
17. No.
18. No.
19. Yes.
20. Schwaninger & Associates, PC
Attn: Benjamin J. Aron
1331 H Street, NW, Suite 500
Washington, DC 20005
202/347-8580 (phone)
202/347-8607 (fax)
bjaron@sa-lawyers.net
21. Yes.

We hope that this will provide all the information we were unable to provide using the Commission's automated system. We are happy to provide any further information as will be required to enable the Commission to process this application. Feel free to contact me with any questions or to request further information.

As attorneys for CUI, in accord with Section 1.12 of the Commission's Rules, please provide us with a copy of any correspondence regarding this application.

Very truly yours,



Benjamin J. Aron