

Rural Wireless Broadband Access in the 3650-
3700 MHz Band

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Docket No. 040116021-4021-01

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COMMENTS OF INTEL CORPORATION TO THE

NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION

Intel commends the National Telecommunications and Information Administration for initiating this inquiry seeking public comment to explore the merits of frequency and geographic avoidance technologies and other interference-mitigation techniques and to examine technical requirements to allow compatible unlicensed device usage in the 3650-3700 MHz band.

Intel is the world's largest semiconductor manufacturer and a leader in technical innovation. Intel is also a leading manufacturer of communications and networking chips and equipment.

Intel believes that making this band available for wireless broadband wireless with appropriate regulatory provisions could generate several benefits. WIMAX technology is well suited for these frequencies. Also, because several other administrations have allocated spectrum in this band for broadband wireless access, such an allocation could promote lower broadband equipment costs and ease of use. Finally, it would facilitate the deployment of broadband access in rural areas.

However, the success of the proposed sharing would depend on the use of broadband equipment that could economically and efficiently detect and avoid incumbent users. The FCC's *Additional Spectrum for Unlicensed Devices Below 900 MHz and in the 3 GHz Band* proceeding

raises similar issues. Intel is conducting substantial research on coexistence techniques with incumbent TV broadcasters. A similar level of due diligence will be needed to develop a robust method for coexistence with the Navy sites. Intel plans to perform this research and looks forward to sharing its results with the NTIA and FCC to enable this valuable new use of the 3650-3700 MHz band.

Respectfully submitted,

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