

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
International Bureau Seeks Comment on)	IB Docket No. 16-185
Recommendations Approved by World)	
Radiocommunication Conference Advisory)	
Committee)	

COMMENTS OF AT&T

AT&T Services, Inc. (“AT&T”), on behalf of the subsidiaries and affiliates of AT&T Inc. (collectively, “AT&T”), hereby submits these comments in response to the Public Notice released by the International Bureau of the Federal Communications Commission (“Commission”) in the above-captioned proceeding.¹ The Commission has taken critical steps to help ensure American leadership in next-generation mobile broadband services. As countries around the world jockey to win the ongoing race to 5G, the Commission has focused on freeing additional spectrum for mobile broadband use and modernizing infrastructure siting rules to accelerate deployment. The Commission’s domestic actions have positioned the United States to lead the global 5G revolution, but winning the race to 5G will require smart international policies that complement our domestic approach. The proposals that the United States will advocate at the 2019 World Radiocommunication Conference (“WRC-19”) should help secure our position as the world’s wireless leader. To this end, AT&T urges the Commission to support identifying the 47.2-50.2 GHz range for IMT on a global basis with respect to Agenda Item 1.13 and to ensure that any regulatory actions regarding High Altitude Platform Services (“HAPS”)

¹ *International Bureau Seeks Comment on Recommendations Approved by World Radiocommunications Conference Advisory Committee*, Public Notice, IB Docket No. 16-185, DA 18-1017 (rel. Oct. 3, 2018) (“Public Notice”).

and Earth Stations in Motion (“ESIM”) provide appropriate protections for fixed and mobile services, Agenda Items 1.14 and 1.5, respectively.

First, on WRC-19 Agenda Item 1.13 (Document WAC/063 (01.10.18)), the United States should advocate for View B’s proposal to identify the 47.2-50.2 GHz frequency range for International Mobile Telecommunications (“IMT”) globally. Importantly, View B’s proposal harmonizes a wide swath of spectrum, on a global basis, for IMT while still ensuring that individual countries retain the flexibility within their borders to authorize different services in the spectrum between 47.2 and 50.2 GHz. Under View B’s approach, countries could make different segments of spectrum available for IMT within the frequency range, depending on national priorities and incumbent uses. View B strikes the appropriate balance between promoting international harmonization and facilitating the flexible use of spectrum for innovative services. Harmonization of the “radio tuning ranges” provides the benefits of economies of scale and global roaming, even if different countries use different segments of the range for IMT.

View A, on the other hand, would curtail global IMT development in the 48.2-50.2 GHz band while unnecessarily mandating universal application of IMT base station implementation requirements related to minimum antenna downtilt and power output. There is no need for a WRC resolution mandating restrictions on IMT-2020 operational characteristics in the Radio Regulations. These operational characteristics are used by wireless providers to minimize intra- and inter-cell interference and guarantee quality of service, and such decisions are properly made outside the scope of the Radio Regulations.

Second, the United States should support View B’s proposal regarding WRC-19 Agenda Item 1.14, the appropriate regulatory actions for high-altitude platform stations (HAPS) within

existing fixed-service allocations. View B provides a partial proposal focused on the protection of mobile and fixed services. It is narrowly focused on resolution 160 which makes clear that the ITU must first consider expanding existing HAPS identifications to a regional or global level. Then, the ITU is invited to consider whether identification in other bands are necessary. The existing identifications provide nearly twice as much spectrum for HAPS as the minimum needed according to ITU studies. In addition, View B recognizes that any increased access of spectrum for HAPS must ensure the protection of mobile and fixed services. The technical conditions that have been proposed by HAPS proponents cannot be relied upon as they have been a moving target, there is no information on what sharing with this system would be like, and compatibility studies are still ongoing.

Third, the United States should support View B proposal on WRC-19 Agenda Item 1.5 regarding the use of frequency bands 17.7-19.7 GHz and 27.5-29.5 GHz by earth stations in motion (ESIM). ESIM identification must ensure the protection of mobile services. The power flux density mask proposed in View B is a composite mask which utilizes the formula provided by WP5A as well as the technical characteristics for both mobile broadband systems provided by WP5A, in contrast to View A which only considers protection of one mobile broadband system.

Respectfully submitted,

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