

allocation of spectrum dedicated wholly to use by "new technology interests" is unwarranted and not in the public interest; or, alternatively, that allocation of 2 GHz OFS spectrum to new technologies is inappropriate, and that other spectrum choices can provide a better and less disruptive location for new technology interests.

Accordingly, El Paso respectfully submits that the Commission should not act as proposed in its Notice, but should decline to make any new technology allocation until a clearer need for such an allocation is demonstrated.

Alternatively, should the Commission be convinced that a new technology allocation is required in the near term, the Agency should perform a considerably more detailed analysis to determine how a spectrum accommodation for new technologies could be provided without creating the harmful disruptions which will occur should the present proposal be enacted.

WHEREFORE, THE PREMISES CONSIDERED, El Paso Natural Gas Company respectfully requests the Commission to act in a manner fully consistent with the views expressed herein.

Respectfully submitted,

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