

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
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In the Matter of:)
)
Redevelopment of Spectrum to)
Encourage Innovation in the Use of)
New Telecommunications Technologies)

ET Docket No. 92-9

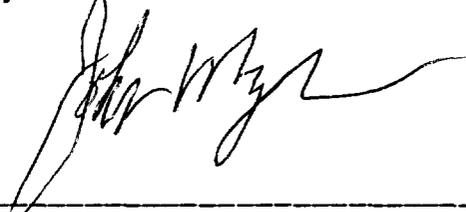
**Comments of the
Telecommunications Industry Association
Mobile Communications Division**

The Mobile Communications Division (hereinafter MCD) of the Telecommunications Industry Association (TIA) is pleased to submit these comments on behalf of its membership in the above-captioned Notice of Proposed Rulemaking. The Division represents manufacturers and suppliers of telecommunications equipment used primarily in the cellular, private land mobile and cordless telephone radio services. Moreover, TIA develops and produces technical standards for these products and their related systems.

Respectfully submitted by:



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TIA applauds the Commission's increased focus on wireless telecommunications requirements. The instant Notice of Proposed Rulemaking on redeveloping spectrum in the 1-3 GHz band for emerging technologies such as new personal communications services (PCS) is a critical issue for TIA's members and their customers. Therefore, TIA's Mobile Communications Division welcomes the opportunity to comment on the instant proposal and to offer recommendations for moving forward with PCS allocations that will benefit the U. S. economy as a whole.

Throughout history, the mobile communications industry has been a leader in improving spectrum efficiency as technologies become available at levels of quality and costs that meet users' needs. Numerous advances in technology have been developed and implemented that offer mobile users improved quality, additional features and increased spectral efficiency. Member manufacturers are already well on their way to developing digital equipment which will increase the communications capacity of current wireless telecommunications systems.

History has shown that application of more efficient technologies in existing bands, however, have been interim solutions for the mobile communications community. The ever-increasing demand to accommodate additional users, new features, and new wireless services requires the allocation of additional spectrum in concert with the development of more efficient technologies in existing bands. Notably, the very advances in technology that provide for improved efficiency also offer users additional features and functions that ultimately generate the need for even greater communications capacity. As most U.S. industries rely on mobile communications to run their businesses efficiently, sufficient communications capacity is a necessity, not a luxury. The drive to be competitive also necessitates increased efficiency and convenience in our personal lives as well to maintain the quality of life the American public expects.

It is extremely important that additional spectrum be dedicated for emerging technologies such as PCS as soon as possible. As addressed in the Notice, emerging wireless services that the instant proposal will address are already being implemented in Europe and in Asia. The American public should not be denied the benefits of these new wireless services

while the rest of the world moves forward. In addition, telecommunications suppliers need adequate lead time to develop products which serve the specific requirements of the U.S. market. Clear direction now on spectrum allocations to support these emerging technologies and services is a critical element in bringing wireless products to market in a timely manner.

In the late 50's and early 60's land mobile growth caused a shortage of spectrum, particularly in major urban areas. In response to this need, the Commission reallocated spectrum in the 800-900 MHz band for private and common carrier mobile uses. Initially, forty MHz of this spectrum was allocated for the development of the cellular mobile telephone service and thirty MHz for private trunked and conventional systems. In 1986, because of the increasing demand for private radio and cellular service, the Commission allocated an additional 16 MHz for private land mobile and 10 MHz for cellular from the 800-900 MHz band. Many of the wireless products U.S. businesses and the public consider commonplace today have resulted from technological developments made possible by these allocations.

These allocations encouraged increased investment in development of high quality, spectrally efficient mobile communications systems for U.S. businesses, governmental agencies and the public at large. In addition to the domestic benefits, these allocations positioned the U.S. to lead the effort during the 1979 World Administrative Radio Conference (WARC) in encouraging provisions for cellular and private trunked systems around the world. Decisions resulting from the 1979 WARC opened a vast opportunity for U.S. export of our telecommunications products, services and expertise. Many of the advances in mobile communications we enjoy today in the global market were made possible by the 800-900 MHz U.S. allocations. Similarly, decisions this Commission makes regarding spectrum for new emerging technologies such as PCS will determine whether or not the U.S. maintains its leadership role in the global as well as domestic market.

A key issue in allocating spectrum for emerging technologies is accommodation of incumbent fixed microwave users' requirements. The Fixed Point-to-Point Communication Section of TIA is well versed in the design of microwave systems, and has developed a number of specific recommendations which may assist the Commission in providing true reaccommodation for the critical needs of microwave users in a timely manner. The Mobile Communications

Division recommends the Commission address more specific requirements to effect such reaccommodation. MCD recommends these issues be addressed concurrently to ensure that spectrum is dedicated for emerging technologies such as PCS without delay.

The MCD also stands ready to assist the Commission in developing standards for emerging wireless technologies such as PCS. TIA is an ANSI accredited organization with significant experience in developing standards recommendations to help meet the combined requirements of mobile communications users, service providers and manufacturers. TIA has played a key role in defining standards for the wealth of wireless communications offerings we enjoy in the U.S. As the Commission moves forward to address specific emerging technologies such as PCS, TIA has the experience and is committed to assisting in standards development for these services.