

**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 advocates at the 2019 World Radiocommunication Conference (“WRC-19”) should help secure our position as the world’s foremost wireless leader. To this end, AT&T urges the Commission to support identifying the 37.0-43.5 GHz frequency range for IMT on a global basis with respect to Agenda Item 1.13 and to support “No Change” proposals for Agenda Items 8 and 9.1.1.

¹ *International Bureau Seeks Comment on Recommendations Approved by World Radiocommunication Conference Advisory Committee*, Public Notice, IB Docket No. 16-185, DA 18-423 (rel. Apr. 26, 2018) (“Public Notice”).

First, on WRC-19 Agenda Item 1.13, the United States should advocate for View A’s proposal to identify the 37.0-43.5 GHz frequency range for International Mobile Telecommunications (“IMT”) globally and to allocate mobile service on a co-primary basis in the 40.5-42.5 GHz frequency range.² Importantly, View A’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 37.0 and 43.5 GHz. Under View A’s approach, countries could make different segments of spectrum available for IMT within the 37.0-43.5 GHz frequency range, depending on national priorities and incumbent uses.³

View A strikes the appropriate balance between promoting international harmonization and facilitating the flexible use of spectrum for innovative services. As the Commission has recognized, global harmonization is key to achieving economies of scale and enabling the efficient deployment of next generation technologies.⁴ Along these lines, the wide global tuning ranges inherent in View A’s proposal will empower equipment manufacturers to design and build more innovative equipment using time-division duplex (“TDD”) schemes on a global scale, without being constrained by band plans that segment the band into separate transmit and receive frequency channels. At the same time, View A’s flexible approach will not disturb the spectrum policy choices the Commission has already made about the millimeter wave spectrum that will be critical to 5G success. Specifically, View A affords the United States the latitude to continue

² *Id.*, Attachment A, at 12-19.

³ *See id.*

⁴ *See Use of Spectrum Bands Above 24 GHz For Mobile Radio Services*, Report & Order & Further Notice of Proposed Rulemaking, 32 FCC Rcd. 10988, ¶ 389 (2017) (“Spectrum Frontiers Order”).

pursuing the path it has taken in Spectrum Frontiers proceeding by identifying the 37-40 GHz band for flexible terrestrial use, while still ensuring protection of satellite services in the 40-42 GHz band. View B, on the other hand, would curtail global IMT development in the 40-42 GHz band while unnecessarily mandating universal application of IMT base station implementation requirements related to minimum antenna downtilt and power output.

Second, the United States should support View B’s “No Change” proposal regarding WRC-19 Agenda Item 8. That Item seeks input on whether to remove the United States from two footnotes of the Radio Regulations: (i) footnote 5.297 of Article 5, which allocates the frequency band 512-608 MHz on a primary basis to the fixed and mobile services and (ii) footnote 5.295 of Article 5, which identifies portions of the frequency band 470-608 MHz for IMT.⁵ View B’s proposal, which AT&T supports, would preserve the United States’ continued inclusion in the footnotes. As CTIA and others have advised, deleting the United States from these footnotes would unnecessarily thwart the global harmonization of the 600 MHz spectrum recently repurposed in the incentive auction. Moreover, removing the United States from the footnotes would eliminate important flexibility to make additional spectrum in the 470-608 MHz frequency range available for innovative mobile uses.

Third, the United States should support View A’s “No Change” proposal on WRC-19 Agenda Item 9.1.1, which seeks feedback on potential technical and operational procedures to facilitate spectrum sharing between terrestrial and satellite IMT services in the 1980-2010 MHz and 2170-2200 MHz frequency ranges.⁶ View A would maintain the status quo of existing

⁵ Public Notice, Attachment A, at 67.

⁶ *Id.*, Attachment A, at 33.

protections while View B would impose burdensome power limits on the terrestrial services.⁷ In particular, View A would permit countries to facilitate either terrestrial or satellite IMT, subject to bilateral coordination where necessary, without imposing burdensome restrictions on either service.⁸ Such an approach would ensure successful coexistence without arbitrarily limiting terrestrial IMT output power and hindering 5G deployment.

The race for world leadership in 5G is underway and time is of the essence. The decisions the Commission makes today will “help ensure continued American leadership in wireless broadband” tomorrow.⁹ By supporting the positions advanced herein at WRC-19, the Commission will greatly facilitate the transition to innovative 5G services and secure the next phase of U.S. wireless leadership.

Respectfully submitted,

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⁷ See *id.*, Attachment A, at 34-47.

⁸ See *id.*

⁹ Spectrum Frontiers Order ¶ 3.