

devices." Other commenters, such as Hewlett-Packard (p. 2) stress the importance of allocating spectrum that is adjacent to spectrum already allocated. Similarly, Ericsson (pp. 21-22) demonstrates that the unallocated spectrum in the 1895-1910 MHz band "would give unlicensed PCS users 35 MHz within which to provide the services the FCC has clearly recognized as being in the public interest." Thus, there is strong support for AT&T's suggestion (p. 15) that the 15 MHz between 1895 and 1910 should also be allocated for unlicensed applications.<sup>33</sup>

There are a very few commenters, however, who oppose even the Commission's initial proposed allocation of the 1910-1930 MHz band because of potential interference with incumbents.<sup>34</sup> For example, API (p. 15) states that the "concept of unlicensed operations in any

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<sup>33</sup> Indeed, Apple (p. 3) "urges not only that more spectrum be allocated to [un]licensed use at the outset, but that a substantial reserve be created." AT&T concurs with Apple and reiterates (p. 15) that the Commission could "create a reserve of any spectrum in the targeted area, not immediately reallocated for either licensed or unlicensed PCS, to meet future PCS growth needs." See also, Comments of AT&T (ET Docket No. 92-9, June 5, 1992).

<sup>34</sup> See, Alcatel, p.3 (opposes until adequate safeguards adopted to protect incumbents from interference); EEI, p.4 (opposes allocation of spectrum to unlicensed users on a co-sharing basis with incumbents); Harris, p.4 (unlicensed devices should be secondary to incumbents); and, Viacom, p. 16 (Commission should review difficulties to incumbents prior to assigning frequencies to incumbents).

portion of the band poses significant operational hazards which are unacceptable to incumbent licensees." Indeed, AT&T itself believes that "[b]ecause neither manufacturers nor users of unlicensed spectrum would hold specific spectrum licenses, it is likely that at least some degree of unpredictable and uncontrollable interference will occur." (AT&T, pp. 14-15). However, that is why AT&T, along with the vast majority of commenters addressing these concerns, suggests that the only way to ensure a congenial environment for unlicensed devices, while eliminating any possibility of interfering with existing users, is to clear the spectrum as expeditiously as possible of all current incumbents.<sup>35</sup>

To facilitate the clearing and reaccommodation of incumbents, the majority of commenters concur with AT&T's recommendation (p. 14) that an "independent, private industry advisory council [be established] to coordinate any needed relocation" issues facing

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<sup>35</sup> See, e.g., APC, p. 19; Ameritech, p. 12; Andrew, p. 6; CMI, p. 2; IEEE, p. 7; NTI, p. 18; PerTel, p. 17; SWBT, p. 32; Comments of AT&T (ET Docket No. 92-9, June 5, 1992); cf., CTP, pp. 17-18 (no spectrum should be set aside for unlicensed devices). However, the FCC should not preclude the early deployment of those unlicensed systems that can operate on a non-interfering basis, which may require that the operation be site specific or geographically contained.

incumbents.<sup>36</sup> For example, CMI (p.3) suggests that "[e]xisting wireless industry groups . . . establish a clearing house organization to handle the payments for this relocation" of incumbents. Similarly, Hewlett-Packard (p. 2) believes "that only an industry group will have the motivation and means to manage and fund the relocation of the incumbents."<sup>37</sup> Thus, an Independent Industry Advisory Counsel ("IIAC") should be created that would be chartered to handle the reaccommodation of fixed microwave operation.<sup>38</sup>

Furthermore, commenters agree that the IIAC should also be responsible for determining the process of compensating the incumbents as well as identifying schedules for the incumbents to follow in their

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<sup>36</sup> See, e.g., Hitachi, p. 8; MCC, p. 6; McCaw, pp. 40-42; Motorola, p. 42; Rolm, pp. 21-22; TIA-MCD, pp. 7-8; Telocator, pp. 22-24; UTC, p. 20; and, WINForum p. 8.

<sup>37</sup> In addition, AT&T (pp. 14-15) also supports the development of a separate industry body to identify the most appropriate channelization scheme and operating rules to accommodate unlicensed devices, it believes that it is premature to finalize such channelization plans in this comment cycle. See also, Comments of AT&T, UTC Petition (RM 7981, June 1, 1992) and Comments of AT&T filed before NTIA, (920532-2132, November 6, 1992).

<sup>38</sup> The determination of the procedures the IIAC would follow should be done under the Commission's supervision, by an ad hoc council, which could include all affected parties. The ad hoc council would dissolve once the Commission accepts the procedures, and the IIAC would then follow through on the procedures.

transition to other spectrum.<sup>39</sup> (See AT&T, p. 14.) For example, EEI (p. 5) demonstrates that "[w]ith regard to unlicensed PCS the only method by which existing users can be assured of reimbursement of relocation expenses is if all manufacturers/vendors of unlicensed PCS equipment are required to join a consortium that guarantees the costs of 2 GHz relocation prior to FCC equipment certification." Similarly, Telocator (pp. 22-24) supports the creation of a consortium to assume the obligation of raising capital through voluntary initial contributions or loans, which it would then use to negotiate with, and compensate, incumbents to be relocated. AT&T agrees with Telocator that the amount of capital necessary to properly compensate relocated incumbents may be overly burdensome for manufacturers of unlicensed devices that require this spectrum to develop, thus, AT&T also suggests raising capital through voluntary loans or the posting of bonds.<sup>40</sup>

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<sup>39</sup> See, e.g., CMI, p. 3; Hewlett-Packard, p. 2; Hitachi, p. 8; Motorola, p. 42; Rolm, pp. 21-22; WINForum, p. 10.

<sup>40</sup> However, as AT&T set forth in its comments (p. 15), while all incumbents that relocate should be afforded full and fair remuneration, there should be no special incentives or windfall profits granted to any incumbents, including state and local government incumbents that may not be required to immediately relocate.

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CONCLUSION

For the reasons stated above and in AT&T's Comments, the Commission should adopt the proposal in the NPRM for the allocation of 2 GHz spectrum with the modifications AT&T has described. Additionally, for the reasons stated by AT&T, the proposed allocation of spectrum for unlicensed PCS should be increased; alternatively, the Commission should create a reserve to meet future PCS growth needs, composed of any spectrum not immediately allocated to license or unlicensed PCS.

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January 8, 1992

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ALLTEL Corporation ("ALLTEL Companies")

American Gas Association ("A.G.A.")

American Mobile Telecommunications Association, Inc.  
("AMTA")

American Personal Communications ("APC")

American Petroleum Institute ("API")

American Telephone and Telegraph Company ("AT&T")

Ameritech

AMSC Subsidiary Corporation ("AMSC")

Anchorage Telephone Utility ("ATU")

Andrew Corporation ("Andrew")

Arch Communications Group, Inc. ("Arch")

Associated PCN Company ("APCN")

Association of American Railroads ("APCN")

Association of American Railroads ("AAR")

Associated Public-Safety Communications Officers, Inc.  
("APCO")

Associated Public-Safety Communications Officers, Inc.  
Arizona Chapter

Bell Atlantic Companies ("Bell Atlantic")

BellSouth Corporation, BellSouth Telecommunications, Inc.,  
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Calcell Wireless Inc. ("Calcell")

California Microwave, Inc.

People of the State of California and the Public Utilities Commission of the State of California ("California")

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Cellular Service, Inc. ("CSI")

Cellular Telecommunications Industry Association ("CTIA")

CELSAT Inc. ("CELSAT")

Centel Corporation ("Centel")

Century Cellunet, Inc. ("Century")

Chesnee Telephone Company

Cincinnati Bell Telephone Company ("CBT")

Citizens Utilities Company ("Citizens")

City Utilities of Springfield, Missouri ("City Utilities")

Clear Creek Mutual Telephone Company, Mollalla Telephone Company, Monitor Cooperative Telephone Company, Monroe Telephone Company, Mt. Angel Telecommunications, Inc., Pioneer Telephone Cooperative, Scio Mutual Telephone Association and Yelm Telephone Company ("Rural Telcos")

CNet Inc. ("CNet")

Comcast PCS Communications, Inc. ("Comcast")

Communications Satellite Corporation ("COMSAT")

COMSEARCH

Concord Telephone Company ("Concord")

Corporate Technology Partners ("CTP")

Cox Enterprises, Inc. "Cox")

dbX Corporation ("dbX")

Dial Page, Inc. ("Dial Page")

Public Service Commission of the District of Columbia ("D.C. PSC")

Domestic Automation Company ("Domestic")  
Edison Electric Institute ("EEI")  
Electromagnetic Energy Policy Alliance ("EEPA")  
Ericsson Corporation ("Ericsson")  
Express Communications, Inc. ("Express")  
Fleet Call, Inc. ("Fleet Call")  
Florida Cellular RSA Limited Partnership ("Florida Cellular")  
Freeman Engineering Associates, Inc. ("Freeman")  
Gateway Technology, Inc. ("Gateway")  
Global Enhanced Messaging Venture ("Joint Venture")  
Grand Broadcasting Corporation ("Grand Broadcasting")  
GTE Corporation ("GTE")  
Harris Corporation-Farion Division ("Harris")  
Harrisonville Telephone Company ("Harrisonville")  
Hewlett-Packard Company ("Hewlett-Packard")  
Hitachi Telecom (USA), Inc.  
Home Telephone Company ("Home Telephone")  
Hughes Network Systems, Inc. ("HNS")  
IEEE Project 802 Local and Metropolitan Area Network Standards Committee ("IEEE Committee")  
Illinois Commerce Commission ("ICC")  
In-Flight Phone Corporation ("In-Flight")  
Interdigital Communications Corporation ("InterDigital")  
Kerrville Telephone Company ("Kerrville")  
Kleiner Perkins Caufield & Byers ("KPCB")  
Knowledge Implementations, Inc.

LCC Incorporated ("LCC")

Lincoln Telephone and Telegraph Company ("Lincoln")

Matsushita Communications Industrial Corporation of America ("MCC")

McCaw Cellular Communications, Inc. ("McCaw")

MCI Telecommunications Corporation ("MCI")

Metriplex, Inc.

Metrocall of Delaware, Inc. ("Metrocall")

Mobile Telecommunications Technologies Corporation ("Mtel")

Motorola, Inc.

National Association of Broadcasters ("NAB")

National Association of Business and Educational Radio, Inc. ("NABER")

National Association of Regulatory Utility Commissioners ("NARUC")

Manager of the National Communications System

National Rural Telecom Association ("NRTA") and Organization for the Protection and Advancement of Small Telephone Companies ("OPASTCO")

National Telecommunications and Information Administration ("NTIA")

National Telephone Cooperative Association ("NTCA")

New York State Department of Public Service ("NYDPS")

North American Telecommunications Association ("NATA")

Northern Telecom Inc.

NYNEX Corporation ("NYNEX")

Ohio LINX, Inc. ("Ohio LINX")

Omnipoint Communications, Inc.

Pacific Communication Sciences, Inc. ("PCSI")

Pacific Telesis Group

PacTel Paging ("PacTel")  
PageMart, Inc. ("PageMart")  
Paging Network, Inc. ("PageNet")  
Palmetto Rural Telephone Cooperative, Inc. ("Palmetto  
Rural")  
Pass Word, Inc. ("Pass Word")  
PCN America, Inc. ("PCNA")  
PCN Communications, Inc.  
PDM/PCS  
Pennsylvania Public Utility Commission ("PaPUC")  
Personal Communications Network Services of New York, Inc.  
("PCNS-NY")  
PerTel, Inc.  
City of Phoenix Fire Department  
Piedmont Rural Telephone Cooperative, Inc. ("Piedmont  
Rural"), West Carolina Rural Telephone Cooperative, Inc.  
("West Carolina Rural"), and Farmers Telephone Cooperative,  
Inc. ("Farmers")  
Point Communications Company ("Point")  
PowerSpectrum, Inc. ("PSI")  
Public Safety Microwave Committee ("PSMC")  
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QUALCOMM Inc. ("QUALCOMM")  
Rochester Telephone Corporation ("Rochester")  
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South Carolina Telephone Association ("SCTA")  
Southern New England Telecommunications Corporation ("SNET")  
Southwestern Bell Corporation ("SBC")  
SpectraLink Corporation  
Sprint Corporation ("Sprint")  
Swayzee Telephone Company ("STC")  
Taconic Telephone Corp. ("Taconic")  
Tampa Electric Company  
Tandy Corporation ("Tandy")  
Teco Energy, Inc.  
Teknekron Communications Systems, Inc. ("TCSI")  
Teleport Denver Ltd. ("TDL")  
Telecommunications Industry Association Mobile  
Communications Division ("TIA MCD")  
Telocator, The Personal Communications Industry Association  
Telephone and Data Systems, Inc. ("TDS")  
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CERTIFICATE OF SERVICE

I, Janice Knapp, hereby certify that a true copy of the foregoing "AT&T Reply Comments" was served this 8th day of January, 1993 by first-class mail, postage prepaid, upon the parties on the attached service list.

  
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