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

In the Matter of	)	GEN Docket No. 90-314
	)	ET Docket No. 92-100
Amendment of the Commission's Rules to Establish New Personal Communications Services	)	RM-7140, RM-7175, RM-7617, RM-7618, RM-7760, RM-7782, RM-7860, RM-7977, RM-7978, RM-7979, RM-7980
	)	PP-35 through PP-40, PP-79 through PP-85

Reply Comments Of The North American Telecommunications Association

The North American Telecommunications Association ("NATA") submits the following reply to comments in response to the Commission's Notice of Proposed Rule Making and Tentative Decision, FCC 92-333, released August 14, 1992. Review of the comments indicates a high degree of consensus on four key points advocated by NATA.

First, almost all parties who commented on the issue support the Commission's proposal to allocate spectrum for unlicensed PCS devices. These parties agree that there is a vast, unserved need for wireless voice and data communications within the office environment, and that the office market provides a natural "laboratory" for the development of personal communications technology. American Personal Communications at 19-20; Andrew Corp. at 3-6; Apple Computer, Inc. at 1; AT&T at 13; California Microwave, Inc. at 2; Cincinnati Bell at 15; Domestic Automation Company at 4; Ericsson Corp. at 20; Hewlett-Packard at 2; Hitachi Telecom at 1-2; Interdigital Communications Corp. at 10-12; IEEE

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802 Local Area Network Standards Committee at 2; Lincoln Telephone at 10; Matsushita at 5; McCaw at 12; Motorola at 13; NATA at 3-6; Northern Telecom at 15-16; Pacific Telesis Group at 37; Pennsylvania Public Utility Commission at 9-10; ROLM at 10-11; Rose Communications at i; Spectralink at 2; Tadiran; Teknekron at 2; Telocator at 23; United States Small Business Administration, Chief Counsel for Advocacy at 6; United States Telephone Association at 31; U S West at 7; WINForum at 1; Xircom. As ROLM states, "the business environment will be the incubator for emerging personal communications technology." ROLM at 3. In this environment, "[u]nlicensed products . . . will allow rapid service penetration into a market segment not served by current cellular and cordless equipment." Northern Telecom at 15. As McCaw points out, unlicensed PCS products are critical to the advancement of each of the Commission's PCS goals:

> An immediate spectrum allocation to support these devices will directly advance the Commission's goal of rapidly bringing service to the public, stimulate diversity in PCS by allowing the entry of a wide range of manufacturers, promote universality through inexpensive equipment offerings that can be deployed anywhere in the United States, and enhance competition by providing fixed cost alternatives to PCS offerings based on recurring access charges.

McCaw at 12.

Second, the bulk of the parties addressing the issue agree that the proposed allocation of 20 MHz is insufficient even as an initial allocation for unlicensed PCS. Andrew Corp. at 6-9 (minimum of 40 MHz required); Apple Computer, Inc. at 3 (immediate allocation of 40-65 MHz required); AT&T at 14-15 (65 MHz initially

required); California Microwave, Inc. at 2; Cincinnati Bell at 15 (40 MHz should be allocated); Ericsson Corp. at 20-22 (35 MHz should be initially allocated); Hewlett-Packard at 2 (minimum of 40-65 MHz required); Interdigital Communications Corp. at 10-12 (allocation should be increased to 40 MHz); IEEE 802 Local Area Network Standards Committee at 2 (immediate need of 70 MHz for wireless LANs alone); Lincoln Telephone at 10 (60 MHz should be allocated); NATA at 6-8 (office telephony alone requires about 40 MHz); Northern Telecom at 19-22 (35 MHz should be allocated immediately); Pacific Telesis Group at 37-39 (Commission should allocate 65 MHz); ROLM at 16-19 (minimum of 40 MHz required for wireless office telephony alone); Rose Communications at 3-7 (immediate need for at least 40 MHz, eventually 80 MHz); Teknekron at 2 (immediate needs are as high as 70 MHz); United States Telephone Association at 31 (40 MHz should be allocated); WINForum at 5-8 (immediate need for 40-65 MHz); Xircom at 2 (50 MHz needed for wireless LANs alone). Moreover, these estimates generally assume favorable conditions, such as relatively clear spectrum and the development of a spectrum "etiquette" that allows voice and data to share the same band of spectrum. Such favorable conditions are not assured.[1] In order to realize the potential of wireless

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[1]It is not clear that voice and data products can share spectrum. See, e.g., ROLM at 19; Rose Communications, Inc. at 7-9. As to clear spectrum, a number of parties point out that the Commission's proposals for unlicensed PCS assumed that there were only 28 microwave receivers between 1910 and 1930 MHz in the top 50 MSAs. It now appears that there are close to 500 microwave facilities in those bands.

office communications, the Commission must substantially expand its proposed allocation for unlicensed PCS.

Third, many commenting parties agree with NATA that the Commission's technical rules must allow for a wide range of technological diversity and experimentation. Domestic Automation Company at 6-8; Ericsson Corp. at 23-24; Hitachi Telecom at 3-7; Interdigital Communications Corp. at 10-12; IEEE 802 Local Area Network Standards Committee at 9-11; NATA at 8-10; Northern Telecom at 15-16; ROLM at 10-13; Rose Communications at 9-11; Spectralink at 2; Tadiran; Telocator at 20; U S West at 8-9; WINForum at 12-14. Industry work is proceeding on the development of a spectrum "etiquette" that will allow a multiplicity of proprietary technology based devices to share the spectrum. The work of the WINForum involves participation by a large and diverse group of equipment manufacturers. Commission should consider carefully the results of this effort and shape its technical rules so as to accommodate diverse technologies to the greatest extent practicable.

Finally, there is broad consensus that the FCC should authorize the formation of a collective industry entity to fund and administer the clearing of unlicensed PCS spectrum. Many parties contend that unlicensed devices cannot successfully co-exist with fixed microwave licensees. If so, then in order to allow unlicensed devices, the spectrum allocated for that purpose must be completely cleared. Even if partial clearing will suffice, most parties addressing the issue agree that the spectrum-clearing

process, if it is to be accomplished in accordance with the compensation procedures announced by the Commission in Docket No. 92-9, requires the involvement of a collective industry entity to fund the necessary compensation and other expenses. American Personal Communications at 20, n. 34; AT&T at 14; California Microwave, Inc. at 3; Hewlett-Packard at 2-3; Hitachi Telecom at 8; Motorola at 40-43; NATA at 10-13; ROLM at 19-23; Telocator at 22-23; WINForum at 11. NATA has advocated this approach and is currently exploring in discussions with other parties the feasibility of establishing such a collective industry entity to conduct negotiations and proceedings and to fund compensation arrangements necessary for the relocation of microwave users in the unlicensed bands. NATA expects to provide additional information to the Commission on these subjects as more concrete proposals emerge.

CONCLUSION

The Commission should authorize spectrum for unlicensed wireless premises systems in accordance with the foregoing reply comments.

Respectfully submitted,

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Date: January 8, 1993

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Reply Comments of the North American Telecommunications Association was served this 8th day of January, 1993, by hand-delivery, to the following persons at the addresses listed below:

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