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June 21, 2000

Magalie Roman Salas
Secretary
Federal Communications Commission
Washington, DC 20554

RECEIVED
JUN 21 2000
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Petitions for Postponement of MDS/ITFS Two-Way Filing Window;
DA 00-1256

97-217

Dear Ms. Salas:

On June 20, 2000, representatives of WorldCom, Inc. ("WorldCom") and Sprint Corporation ("Sprint") met with Barbara Kreisman, Charles Dzedzic, Sharon Bertelsen, David Roberts and Brad Lerner of the Mass Media Bureau's Video Services Division to discuss their opposition to any delay in the July 3-10, 2000 filing window for two-way MDS/ITFS applications. Robert S. Koppel, Bradley Stillman and Gerald Stevens-Kittner attended on behalf of WorldCom. Jay Keithley and the undersigned attended on behalf of Sprint.

The parties distributed the enclosed hand-out at the meeting.

Respectfully submitted,



Paul J. Sinderbrand

Enclosure

cc: Barbara Kreisman
Charles Dzedzic
Sharon Bertelsen
David Robert
Brad Lerner

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List A B C D E

THE FCC SHOULD NOT DELAY THE INITIAL MMDS/ITFS TWO-WAY FILING WINDOW

- ANY DELAY IN THE FILING WINDOW WILL DELAY THE DEPLOYMENT OF WIRELESS BROADBAND SERVICES INTO THE RESIDENTIAL, SMALL BUSINESS AND RURAL MARKETS WHERE IT IS NEEDED THE MOST.
 - WorldCom, Sprint and others are ready, willing and able to deploy such services.
 - Any delay in the filing window will result in unnecessary delay in providing service to customers who have no access to broadband services.
 - Any delay will put MMDS further behind in the race (with DSL and cable modems) to provide service to underserved customers.
- LICENSEES WHO DO NOT FILE IN THE INITIAL WINDOW WILL NOT BE HARMED.
 - Those not ready to file in the first window will be permitted to file in rolling windows that will open by late November or early December.
 - There is no evidence that the interference protection rules will preclude those who do not file in the initial window from filing afterwards.
 - The Report and Order specifically found that the new interference protection rules are not unduly preclusive of future filings.
 - WorldCom and Sprint, who would have the most to lose were there a preclusive effect, are prepared to move forward – even though they will not be filing in the first window for two-way authority on all of their channels.
 - Real world analysis shows the interference protection afforded existing (downstream) stations is more conservative than that afforded new upstream stations.
 - As a practical matter, licensees not filing in the first window will be fully protected because co- and adjacent channel licensees filing in the window will likely need to obtain interference consent letters from non-filing parties. The non-filing party can insist on language in the consent letter that protects its ability to file later.
- THOSE WHO HAVE BEEN DILIGENT IN THE 20 MONTHS SINCE THE REPORT AND ORDER WILL BE ABLE TO SUBMIT COMPLETE AND ACCURATE APPLICATIONS DURING THE JULY 3-10 WINDOW.
 - Concerns based on the state of software development are without basis.
 - CelPlan software performs interference analyses in full compliance with the FCC's technical rules and allows those served with applications to study the interference impact on their existing downstream facilities.
 - Specialized software like CelPlan is not a prerequisite to filing two-way applications.
 - Ample time has been afforded for engineers to secure training and prepare applications.
 - The lack of a definitive FCC-maintained database does not prevent the preparation and filing of applications.
 - There has never been a definitive FCC-maintained MMDS/ITFS licensing database.
 - The Report and Order rejected proposals that the filing window be contingent on the development of such a database.
 - WorldCom, Sprint and others have had no difficulty securing information from private databases or the FCC reference room.