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Before the
Federal Communications Commission
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
CINGULAR WIRELESS LLC)
)
Petition for Waiver of Section 22.367 of the)
Rules Concerning Wave Polarization in the)
Cellular Radiotelephone Service)

File No. _____

WT 0-108

To: Chief, Wireless Telecommunications Bureau

**SUPPLEMENT TO
PETITION FOR WAIVER**

Cingular Wireless LLC ("Cingular") hereby supplements its November 19, 2001 Petition for Waiver in response to an informal staff request for additional information concerning its deployment plans that drive the need for a waiver.

As the Cingular Petition stated, and as set forth in the attached Press Release, Cingular is beginning to upgrade its network to third generation wireless data technology by introducing Enhanced Data Rates for Global Evolution (EDGE) technology. This move to EDGE will begin with the overlay of General Packet Radio Service (GPRS) packet data and Global System for Mobile Telecommunications (GSM) voice technologies in Cingular's TDMA and analog networks.

Cingular will be the first wireless carrier to implement GPRS and GSM in the 800 MHz cellular spectrum, thus giving rise to Cingular's request for a timely grant of the waiver request. The upgrade to GPRS and GSM, which will bring new and exciting services to the public, will require the installation of new antennas at each of Cingular's cell sites. In addition, it will

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require a substantial increase in the number of antennas on each tower, unless Cingular's waiver request is granted.

Cingular plans to begin installation of new antennas by the second quarter of 2002 with completion expected in four markets by the end of the third quarter, including one of the twenty largest MSAs. This installation will affect over 700 cell sites or over 6,300 antennas. By the end of the fourth quarter of 2002, Cingular plans to have installation complete in 21 markets, including 8 large MSAs. This installation ultimately will affect over 5,000 cell sites or over 45,000 antennas. To meet this schedule, Cingular needs to order equipment no later than February of this year. Cingular would be ordering the dual polarized antennas in large quantities now if the waiver had already been granted.

As Cingular highlighted in its waiver request, employing diversity (dual-polarization) antennas at base stations can reduce the total number of antennas needed at a given site, especially in urban and suburban areas. The upgrade of Cingular's system will bring the significant public interest benefits of new and competitive services to the public. At the same time, employing dual polarized antenna as part of this upgrade will serve the public interest by reducing the visual impact of the towers, reducing tower loading, minimizing the need for new tower construction, minimizing zoning issues, and lowering the cost of the upgrade.

For example, Cingular will be able to avoid re-zoning because antennas would simply be replaced with the dual polarized antennas rather than adding new antenna to each tower (assuming that the tower could bear the additional load). This reduces the number of antennas as a result of the overlay at a typical cellsite from eighteen to nine per cellsite, the same number as are now used for TDMA/analog alone - without a waiver, a three-sector cellsite would need nine antennas for TDMA/analog and nine for the GSM GPRS/EDGE overlay, versus three dual-

polarized antennas per sector with the waiver. In addition to reducing the visual impact, this also avoids the potential three- to twelve-month delay necessary for re-zoning.

Grant of Cingular's Petition for Waiver by mid-February is critical to the timely establishment of Cingular's GSM/GPRS/EDGE overlay, and realization of the public interest benefits mentioned above. As noted above, Cingular needs to order equipment — in particular, antennas — by February. If the waiver has not been granted, Cingular will be required to deploy twice the number of antennas and feed lines. Cingular will also have to build additional towers in instances where its current towers cannot handle the extra load. The extra time required for zoning approval will necessarily delay Cingular's roll-out of new services to the public, and the cost of seeking such approvals and of installing twice the number of antennas will be significant.

CONCLUSION

For all of the foregoing reasons, Cingular submits that a prompt waiver of Section 22.367 would serve the public interest and would not frustrate the purposes of the rule. Accordingly, Cingular requests that the waiver should be granted no later than mid-February 2002.

Respectfully submitted,

CINGULAR WIRELESS LLC

By: 
J.R. CARBONELL
CAROL L. TACKER
DAVID G. RICHARDS
5565 Glenridge Connector
Suite 1700
Atlanta, GA 30342
(404) 236-5543

Its attorneys.

January 14, 2002.

ATTACHMENT

Cingular Press Release

“Cingular Moves to the Edge”

October 30, 2001



FOR IMMEDIATE RELEASE

CONTACT: Clay Owen
Cingular Wireless
404-236-6153
clay.owen@cingular.com

CINGULAR MOVES TO THE EDGE

Consumers to reap benefits of fast, always-on wireless technology

Press Conference at 11:30 a.m. Eastern. To listen via streaming audio Web cast, go to --

<http://www.videonewswire.com/event.asp?id=1864>

ATLANTA, Oct. 30 2001 – Cingular Wireless today announced it will begin upgrading its network to third generation wireless data technology – with the introduction of EDGE, bringing consumers nationwide the benefits of faster speeds for accessing the wireless Internet and information anytime, anywhere.

The upgrade to EDGE (Enhanced Data Rates for Global Evolution) will put in place wireless always-on packet data technology capable of transmitting data at up to peak rates of 470kbps – fast enough to support full-motion video.

“Cingular – already the national leader in packet data – is going a step further to transition our network to a worldwide 3G standard,” said Stephen Carter, president and CEO of Cingular. “At the same time, we will be providing our customers with a single voice technology from coast-to-coast.”

The move to EDGE will begin with the installation of GPRS (General Packet Radio Service) packet data and GSM (Global System for Mobile Telecommunications) voice technology over Cingular's TDMA and analog networks. GSM is the world's leading digital wireless technology. More than half a billion GSM phones are in use worldwide, accounting for more than 70 percent of the world's digital wireless market. The technology also allows customers with tri-band or "world" phones to use their phones seamlessly in more than 160 countries.

Ericsson, Nokia and Siemens have been selected to assist with the infrastructure build out. These three vendors have also been developing the GSM/TDMA dual-technology terminals for some time and have been selected to be Cingular's primary suppliers of these devices. They will also be among a larger group of suppliers of 850/1900 GSM handset suppliers.

Cingular already uses GSM technology in California, Washington, Nevada, South Carolina, North Carolina, Eastern Tennessee and Coastal Georgia.

"GSM is clearly the world's choice for wireless technology," said Carter. "Plus, having a common technology throughout the United States will allow us to provide additional capabilities and features for our customers."

EDGE will be installed in all markets throughout Cingular's coverage area. GPRS is already marketed in Seattle, Las Vegas, Eastern Tennessee, North Carolina and South Carolina as Cingular Wireless Internet Express. The EDGE network will also be "backwards compatible" meaning customers with GPRS devices can also use them in EDGE markets.

Cingular's decision to pursue EDGE as its third generation technology path is made possible by a number of factors and commitments, including:

- Increased spectrum efficiency achieved through the GSM technology.
- Availability of GSM network infrastructure that operates on 850 MHz and 1900 MHz spectrum.
- Development of GAIT wireless phones, which will allow Cingular customers to seamlessly move between its TDMA to GSM networks.
- Commitments from network infrastructure and terminal vendors to supply Cingular with EDGE infrastructure and devices.

Cingular will continue to provide TDMA service to its current TDMA customers. It is anticipated that demand for the new service will continue to gain momentum, with many upgrading from TDMA to GSM/EDGE devices over time.

"This conversion will be transparent to the large majority of our customers. Since many customers upgrade their handsets about every two years, we expect an extremely smooth transition," said Carter.

ABOUT CINGULAR WIRELESS

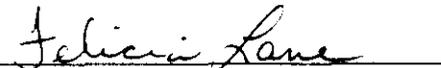
Cingular Wireless is the second largest wireless carrier in the U.S., and is dedicated to self-expression and customer-friendly service. As a leader in mobile voice and data communications, Cingular, a joint venture between SBC Communications and BellSouth, currently serves more than 21.3 million customers nationwide. Cingular offers customers advanced technologies in simple, cost-effective ways that permit them to tap the creative potential of wireless through their own self-expression. Details of the company are available at www.cingular.com.

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CERTIFICATE OF SERVICE

I, Felicia Lane, hereby certify that the foregoing Supplement To Petition For Waiver was served this 14th day of January, 2002 by hand-delivery to:

Roger Noel
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW – Room 4-B115
Washington, DC 20554



Felicia Lane