

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of )  
 )  
Reallocation and Service Rules ) GN Docket No. 01-74  
for the 698-746 MHz Spectrum Band )  
(Television Channels 52-59) )  
 )  
To: The Commission )

Comments of  
United States Cellular Corporation

United States Cellular Corporation on behalf of itself and its subsidiaries (collectively "US Cellular"), by its attorneys, comments regarding technical proposals submitted by Access Spectrum, LLC ("Access Spectrum"), Motorola, Inc. ("Motorola") and Pegasus Guard Band, LLC ("Pegasus") in the above-captioned proceeding.<sup>1</sup>

In its Petition for Reconsideration filed March 8, 2002, Access Spectrum proposed that "...the Commission reduce the power limit for base and fixed stations operating on TV channels 57-59 and prevent A, B and C block licensees from utilizing TV channels 57-59 for base transmit operations."<sup>2</sup> Motorola and Pegasus provide persuasive support for adoption of these proposals.

US Cellular supports the Access Spectrum "solution" described above subject to the following related and remaining technical concern. The near/far interference

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<sup>1</sup> See Petition for Reconsideration of Access Spectrum, LLC dated March 8, 2002, Comments in Support of Petition for Reconsideration of Motorola, Inc. dated March 25, 2002 and Comments in Support of Petition for Reconsideration of Pegasus Guard Band, LLC dated March 25, 2002.

<sup>2</sup> Access Spectrum Petition, p.9.

scenario involving high power signals of base-to-mobile interference appear to be unavoidable for mobiles operating on Channel 57 if high power transmissions are allowed on TV channel 56. If this is true, as appears to be the case, then the power limits to be imposed under the Access Spectrum proposal should be extended to include reduced power limits for Channel 56 as well.

US Cellular supports adoption of the Access Spectrum proposals subject to the adoption of a similar reduced power limit for Channel 56.

Respectfully submitted,

UNITED STATES CELLULAR CORPORATION

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April 1, 2002

WAS1 #1072314 v1