

# Reallocation Proceeding

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Cellular Telecommunications & Internet  
Association

Presentation To

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# Reallocation of Spectrum

- Additional spectrum is needed for terrestrial wireless services.
- Some of the bands discussed in the Third NPRM should be reallocated or otherwise made available for terrestrial service.
- It is critical that the Commission's allocation and service rule decisions take into account potential interference to existing and planned services.

# Creation of a “G Block”

- The Commission should create a “G Block” that pairs 1910-1915 MHz with 1990-1995 MHz for a PCS-like terrestrial service.
- The block should be subject to the Part 24 technical rules used for PCS, since it is adjacent to existing PCS bands.
- The FCC should designate mobile and base transmit bands consistent with the existing operations in adjacent PCS bands.

# The 1915-1930 MHz Band Should Not be Reallocated for PCS-like service

- PCS spectrum should not be extended by more than five MHz into the 1910-1930 MHz band because the PCS base and mobile transmit frequencies require at least a 15 megahertz separation to prevent harmful interference to PCS receivers.
  - The band gap between the PCS mobile transmit and base transmit bands could be reduced from 20 MHz to 15 MHz, but no further.
  - The Commission should not reallocate the 1915-1930 MHz band for higher-powered uses.
- If more stringent out-of-band emission limits could be applied to this piece of spectrum, they would unacceptably compromise the use of the band for CMRS or advanced wireless services.

# The 1995-2000 MHz Band Should Not be Reallocated for PCS-like service

- The Commission should design service rules for the 1995-2000 MHz band that would ensure it would serve as a guardband to protect PCS operations from interference from MSS. This block could be retained for broadcast auxiliary services, or other non-interfering unlicensed uses.
  - A gap of only 5 MHz between PCS-like services and MSS/ATC would be very challenging, but possible given that MSS/ATC licensees could put MSS at the bottom of the band and adopt other mitigation techniques unique to this band.
  - Reducing the gap between MSS/ATC mobiles and PCS base transmit bands to less than 5 MHz would risk significant interference.

## The 2020-2025 MHz band should be reallocated for terrestrial service

- The Commission should reallocate this band to terrestrial fixed and mobile operations, including AWS.
- The FCC must be careful to prevent potential interference to and from adjacent operations
  - This band could be appropriate for unpaired operations such as TDD
  - This band could also be appropriate for relocation of some DOD capabilities from the 1710 MHz band

# The 2155-2180 MHz Bands should be allocated to terrestrial wireless services

- The Commission should pair the 2110-2180 band asymmetrically with spectrum at 1710-1755 MHz, which already has been allocated to AWS.
  - Asymmetric pairing would help ensure more efficient and effective use of the spectrum because many advanced wireless applications will require more spectrum for base transmit paths than for mobile transmit.
  - This would be the most effective use of this spectrum, and would help promote rapid deployment of next generation wireless services to consumers.

# Conclusion

- Additional spectrum for terrestrial service is needed provide cost-effective advanced services to the 150 million + consumers of CMRS
- The FCC should consider how the spectrum at issue in this proceeding relates to other spectrum blocks pending in proceedings at the Commission.