

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

In the Matter of)	
)	
Amendment of Part 2 of the)	
Commission's Rules to Allocate)	
Spectrum Below 3 GHz for Mobile)	ET Docket No. 00-258
and Fixed Services to Support the)	
Introduction of New Advanced)	
Wireless Services, Including Third)	
Generation Wireless Systems)	
)	
Amendments to Parts 1, 2, 27 and)	
90 of the Commission's Rules to)	
License Services in the 216-220 MHz,)	WT Docket No. 02-8
1390-1395 MHz, 1427-1429 MHz,)	
1429-1432 MHz, 1432-1435 MHz,)	
1670-1675 MHz, and 2385-2390 MHz)	
Government Transfer Bands)	

**COMMENTS OF THE
CELLULAR TELECOMMUNICATIONS & INTERNET ASSOCIATION**

The Cellular Telecommunications & Internet Association (“CTIA”)¹ hereby submits the following comments in response to the Commission’s July 7, 2003, Fourth Notice of Proposed Rulemaking (“Fourth Notice”) requesting comment on the Commission’s proposal to facilitate the introduction of new, nationwide advanced wireless services (“AWS”) in the 1710-1755 MHz band by making spectrum available in the 2025-2110 MHz band for Federal Government operations in order to clear the 1710-

¹ CTIA is the international organization of the wireless communications industry for both wireless carriers and manufacturers. Membership in the organization covers all Commercial Mobile Radio Service (“CMRS”) providers and manufacturers, including cellular, broadband PCS, ESMR, as well as providers and manufacturers of wireless data services and products.

1755 MHz segment.² In addition, the *Fourth Notice* would also make a number of changes in the 2360-2400 MHz band that would promote international spectrum harmonization.³

CTIA commends the Commission for its work on these proposals, which signify the Commission's clear intention to follow through on the commitments necessary to make the 1710-1755 and 2110-2155 MHz bands available for AWS. Furthermore, CTIA believes the cooperative effort between the Commission and the National Telecommunications and Information Administration ("NTIA") evidenced in the *Fourth Notice* represents a sound model for effective spectrum management. Accordingly, CTIA generally supports the recommendations contained in the *Fourth Notice*.

I. CTIA SUPPORTS ALLOCATION OF THE 2025-2110 MHz BAND FOR FEDERAL GOVERNMENT TT&C UPLINK USE

In the *Fourth Notice*, the Commission proposes to "revise footnote US346 to permit DOD to operate TT&C transmit earth stations at the 11 existing sites requested by NTIA on a co-equal, primary basis with BAS operations in the band 2025-2110 MHz."⁴ CTIA has no objections to this overall proposal, provided CMRS operations in adjacent bands are protected from interference. CTIA urges the Commission, however, not to let the formulation of rules or procedures governing use of the 2025-2110 MHz band to

² See *Amendment of Part 2 of the Commission's Rules to Allocate Spectrum Below 3 GHz for Mobile and Fixed Services to Support the Introduction of New Advanced Wireless Services, Including Third Generation Wireless Systems, Fourth Notice of Proposed Rulemaking*, ET Docket No. 0-258, WT Docket No. 02-8, FCC 03-134, at ¶ 1 (rel. July 7, 2003) (hereinafter "Fourth Notice"); see also *Federal Government 3G Relocation*, 68 Fed. Reg. 52,156 (Sept. 2, 2003) (setting Nov. 3, 2003, comment date).

³ Fourth Notice at ¶ 2.

⁴ Fourth Notice at ¶ 26.

interfere with or delay the clearing of the 1710-1755 MHz band, which is necessary for the successful deployment of AWS.

II. CTIA SUPPORTS ALLOCATION OF THE 2360-2395 MHz BAND FOR GOVERNMENT USE

The Fourth Notice also proposes to “allocate the band 2360-2395 MHz for aeronautical mobile purposes on a primary basis for Federal Government use.”⁵ CTIA agrees with the *2002 Viability Assessment*, which stated that aeronautical operations should be removed from the 1710-1755 MHz band to avoid harmful interference with AWS services, and suggests the allocation of the 2360-2395 MHz band for Federal government aeronautical radio use.⁶ CTIA again emphasizes, however, that the implementation of any plan to relocate Federal government aeronautical radio services to the 2360-2395 MHz band should not impede the development of final service rules for the 1710-1755 MHz band.

⁵ Fourth Notice at ¶ 51.

⁶ See National Telecommunications and Information Administration, *An Assessment of the Viability of Accommodating Advanced Mobile Wireless (3G) Systems in the 1710-1770 MHz and 2110-2170 MHz Bands*, at 16-18 (July 22, 2002) (hereinafter “2002 Viability Assessment”) (stating that “analyses had shown that if operated on the same frequency, in the same geographic area, at the same time, DOD operations in the 1710-1755 MHz band would interfere with 3G base stations” and noting that “large separation distances would be required to prevent interference between incumbent and 3G systems”).

CONCLUSION

For the aforementioned reasons, CTIA supports the Commission's efforts to clear the 1710-1755 MHz band, consistent with the *2002 Viability Assessment*, and urges the Commission to continue its efforts to ensure that this spectrum is available to meet the requirements for future Advanced Wireless Services.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Christine Blomquist, hereby certify that on this 3rd day of November 2003, the foregoing Comments of the Cellular Telecommunications & Internet Association were filed electronically on the FCC's Electronic Comment Filing System and copies were served via email or first class mail to the following:

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