

Re: WT Docket No. 04-70

Cingular/AT&T Wireless try to justify needing an excessive amount of spectrum due to the disparate, incompatible wireless services they're offering or hoping to offer: AMPS, TDMA, GSM, and W-CDMA.

Their AMPS and TDMA spectrum allocations can be efficiently overlain by GSM. Several companies have already accomplished this. See, for example, Cingular's own document about this:

http://www.3gamericas.org/pdfs/EOF_Cannes_2003/Cingular-Mark-Austin_Revised.pdf

So, no additional spectrum should be necessary for AMPS/TDMA to GSM conversion.

Because W-CDMA, AT&T Wireless/Cingular's 3G chosen technology, is not backwards compatible with GSM, additional spectrum may need to be allocated for W-CDMA, since no vendors have yet offered a W-CDMA "overlay", similar to the CDMA overlay for GSM (GSM1x). See <http://www.gsm1x.com>. Most W-CDMA implementations suggested, so far, use a different range of frequencies than those allocated to GSM. This does not necessarily have to be the case. If the overlay can be done with CDMA (IS-95/cdma2000) it can also be done with W-CDMA.

If, however, no vendors offer the capability at the time Cingular plans to roll out their W-CDMA offerings in four major metropolitan areas (AT&T Wireless' commitment of investor NTT DoCoMo) by the end of 2005, Cingular would only require an extra 10 MHz of spectrum over and above the spectrum required to service their combined projected Erlang load. Certainly, even in their most crowded markets, this wouldn't approach a combined 30 MHz.

As the FCC encourages efficient use of spectrum I would hope that the combined spectrum allocations of Cingular and AT&T Wireless would be reduced to that amount actually required for service, instead of total aggregation of huge amounts of spectrum (up to 80 MHz in some markets!). This spectrum could be re-auctioned to wireless service providers who would provide competition to incumbent wireless carriers.

Thank you!