

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

In the Matter of)	
)	
Service Rules for Advanced Wireless Services in the 1915-1920 MHz, 1995-2000 MHz, 2020-2025 MHz and 2175-2180 MHz Bands)	WT Docket No. 04-356
)	
Service Rules for Advanced Wireless Services in the 1.7 GHz and 2.1 GHz Bands)	WT Docket No. 02-353
)	

Reply Comments of United States Cellular Corporation

United States Cellular Corporation on behalf of itself and its subsidiaries (collectively "U.S. Cellular"), by its attorneys, submits its reply comments in response to comments filed in the above-referenced proceeding. We agree with the comments of CTIA, Sprint and Verizon regarding the steps needed to mitigate harmful interference to PCS mobile operations on A-Block spectrum. We also agree with the numerous comments filed in this proceeding generally supporting the adoption of geographic service area sizes which preserve opportunities for regional and local carriers as part of a balanced approach to geographic service area selection.

Discussion

1. The Record in This Proceeding Supports Adoption of Technical Conditions for H-Block Spectrum to Protect Incumbent PCS Operations from Potential Harmful Interference.

U.S. Cellular has reviewed and concurs with the test results prepared the independent laboratories, PCTest Laboratory, Inc. and the Wireless Information Network Laboratory of Rutgers University, as commissioned and filed in these proceedings by CTIA, Sprint and Verizon.¹ In order to prevent harmful interference to mobile devices in the 1930-1990 MHz PCS band, we strongly support adoption of the following recommendations in the technical rules for AWS spectrum:

¹ See generally *Joint Comments of Sprint Corporation and Verizon Wireless* and *Comments of CTIA*.

- Adopt an output power limit of 5 dBm for terrestrial mobile devices operating in the 1918.125-1920 MHz band;
 - Adopt an output power limit of 8 dBm for terrestrial mobile devices operating in the 1916.875-1918.125 MHz band;
 - In the alternative, designate the 1916.875-1920 MHz band for uses that would not cause harmful interference, such as Fixed or Air-to-Ground use;
 - Complete further testing to determine an appropriate power limit for the 1915-1916.875 MHz band; and
 - Adopt an out-of-band emissions limit for operations in the H Block spectrum that limits emissions into the 1930-1990 MHz PCS receive band to -76 dBm/MHz.
2. The Commission Should Continue to Adopt Geographic Service Area Sizes on a Service-by-Service Basis for All New Licensed Wireless Services to Provide Licensing Opportunities For the Regional, Rural and Local Providers.

U.S. Cellular proposed selection of EAs² or MSA/RSAs³ as the geographic service area size for 1915-1920 MHz paired with 1995-2000 MHz ("H-Block") and 2020-2025 MHz paired with 2175-2180 MHz ("J-Block") spectrum. We believe that adoption of EAs or MSA/RSAs will help meet the needs of regional/local carriers while preserving opportunities for carriers with super-regional coverage needs to aggregate licenses in the spectrum auction.

Several commenters argue that at least a portion of the 1.7 to 2.1 GHz band should be licensed on a MSA/RSA basis.⁴ We agree that MSA/RSA licensing is appropriate to meet the needs of companies interested in providing localized service.

We continue to support EA and MSA/RSA licensing for the H-Block and J-Block spectrum but also are prepared to support use of Basic Trading Area ("BTA") licensing as a possible alternative.

² Economic Areas ("EAs")

³ Metropolitan Statistical Area ("MSA")/Rural Service Area ("RSA")

⁴ *Comments of Rural Cellular Association ("RCA")*, p. 2 and *Comments of Rural Telecommunications Group, Inc.*, p. 2.

CTIA, Nextel, RCA and T-Mobile have all commented in support of BTA licensing.⁵ While there may be some hurdles as noted in the Commission's Notice with respect to the availability of BTAs which must be issued by Rand McNally & Company, BTA licensing is an administratively convenient service area size.

3. The Commission Should Not Adopt Nationwide or Super-regional Geographic Service Area Sizes for H-Block or J-Block Spectrum.

We strongly oppose the adoption of nationwide or Regional Economic Area Groupings ("REAG") licensing for the new AWS spectrum.⁶ There is no record to support the belief that nationwide or REAG licensing is inherently more valuable than uses of combinations of EA (or alternatively BTA) licenses when this spectrum is auctioned. If the Commission were to choose to license the H-Block or the J-Block spectrum with service areas larger than EAs, regional, and rural carriers like U.S. Cellular would be unable to participate and the new or expanded service which they might be able to provide using this new AWS spectrum would be precluded.

Conclusion

CTIA, Sprint and Verizon have amply documented in their filings why it is necessary to adopt appropriate technical conditions for H-Block operations to prevent harmful interference to incumbent adjacent channel PCS operations. We continue to support the implementation of AWS on H-Block spectrum but only subject to the specific conditions which we have identified above.

We also propose use of EA or MSA/RSA licensing because the channel block size, paired configuration, and frequency location of the new H-Block and J-Block spectrum strongly suggest that it can be effectively used to complement established PCS networks. Adoption of EA or MSA/RSA service

⁵ *Comments of CTIA*, p. 5; *Comments of Nextel Communications*, p. 50; *Comments of RCA*, p. 2; *Comments of T-Mobile USA, Inc.*, p. 12.

⁶ *Comments of T-Mobile USA, Inc.*, p. 14; and *Comments of MCI, Inc.*, pp. 2-3.

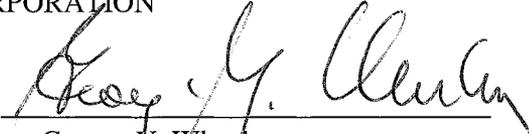
areas (or possibly BTA service areas) will preserve opportunities for regional/rural carriers as well as meet the reasonable needs of national carriers.

Respectfully submitted,

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