

**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 and)	ET Docket No. 00-258
Fixed Services to Support the)	
Introduction of New Advanced Wireless)	
Services, including Third Generation)	
Wireless Systems)	
)	WT Docket No. 02-353
Service Rules for Advanced Wireless)	
Services in the 1.7 GHz and 2.1 GHz)	

COMMENTS OF SPRINT NEXTEL CORPORATION

Sprint Nextel Corporation (Sprint Nextel) hereby submits these comments regarding the selection of entities to act as neutral, not-for-profit clearinghouses responsible for facilitating cost sharing among new entrants benefiting from the relocation of incumbent licenses in the 2.1 GHz bands.¹ Sprint Nextel recommends that the Commission designate multiple clearinghouse managers to promote a more efficient cost-sharing process.

Sprint Nextel is both an incumbent Broadcast Radio Service licensee in the 2.1 GHz band and a non-attributable investor in an applicant participating in the Advanced Wireless Services (AWS) auction. It

¹ Public Notice, "Wireless Telecommunications Bureau Opens Filing Window for Proposals to Develop and Manage the Clearinghouse That Will Administer the Relocation Cost Sharing Plan for Licensees in the 2.1 GHz Bands, WT Docket No. 02-353 & ET Docket No. 00-258, DA 06-1279 (released June 15, 2006).

consequently has a strong interest in promoting a fair and efficient process for relocating incumbent licensees in the band and for sharing relocation costs among new entrants to the band.

Two entities have filed clearinghouse proposals: PCIA – The Wireless Infrastructure Association (PCIA) and CTIA – The Wireless Association (CTIA).² Sprint Nextel believes both proposals have merit and that both PCIA and CTIA are qualified to manage the cost-sharing process. Moreover, both entities have stated their willingness to work with each other if the Commission designates both as clearinghouse managers.³ PCIA, in fact, advocates the designation of multiple clearinghouses.⁴

Sprint Nextel agrees that the designation of both entities as clearinghouses will promote a more effective and efficient cost-sharing process and thereby serve the public interest. The Commission has previously recognized these benefits, having designated two clearinghouses to facilitate relocation cost sharing for the 1.9 GHz Personal Communications Service bands. The Commission stated that selecting multiple clearinghouses was

[i]n keeping with the Commission's goal of fostering competition in the telecommunications marketplace. ... By offering cost-sharing plan participants a choice among clearinghouses, we increase the incentive for both clearinghouses to operate in an efficient manner, thus greatly benefiting the consumers of these

² Clearinghouse Proposal of PCIA (filed July 17, 2006); CTIA Clearinghouse Plan (filed July 17, 2006).

³ Clearinghouse Proposal of PCIA at 6; CTIA Clearinghouse Plan at 14.

⁴ Clearinghouse Proposal of PCIA at 6-7.

services. We believe that in the absence of competition, a single clearinghouse would have less incentive to keep its prices/costs low. Our decision here is consistent with prior Commission decisions relating to frequency coordination, in which we have created competition among coordinators by allowing license applicants to utilize the services of any authorized frequency coordinator.⁵

Although ultimately only one clearinghouse emerged during the PCS cost sharing process, the Commission's decision to establish two clearinghouse managers at the outset created incentives and expectations that helped make the surviving manager more efficient. The Commission should similarly rely on competition to promote an efficient cost sharing process in the 2.1 GHz band. Sprint Nextel therefore requests that the Commission designate both PCIA and CTIA as clearinghouse managers.

Respectfully submitted,

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⁵ *Amendment of the Commission's Rules Regarding a Plan for Sharing the Costs of Microwave Relocation*, Memorandum Opinion and Order, 11 FCC Rcd 9394, ¶ 23 (1996).

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