

MetroPCS Proposed Plan – Upper 700 MHz Band

747	762	777	792										
A	C	D	E	B	Public Safety		A	C	D	E	B	Public Safety	
CH. 60	CH. 61	CH. 62	CH. 63	CH. 64	CH. 65	CH. 66	CH. 67	CH. 68	CH. 69				
746	752	758	764	770	776	782	788	794	800	806			
<u>Block</u>		<u>Frequencies</u>			<u>Bandwidth</u>		<u>Pairing</u>		<u>Area Type</u>		<u>Licenses</u>		
A	746-747, 776-777	2 MHz	2 x 1 MHz	MEA	52*								
B	762-764, 792-794	4 MHz	2 x 2 MHz	MEA	52*								
C	747-752, 777-782	10 MHz	2 x 5 MHz	EA	52, 176								
D	752-757, 782-787	10 MHz	2 x 5 MHz	EA	176								
E	757-762, 787-792	10 MHz	2 x 5 MHz	MEA	52								

*Light Grey highlighted blocks have been auctioned.

MetroPCS' proposed band plan shares a number of similarities with prior proposed plans by RTG and USCC, including support for the inclusion of a greater number of smaller service areas and for smaller spectrum blocks. MetroPCS does suggest some alterations from the prior proposed plans, however, in order to maintain more congruence between service areas licensed in the 700 MHz band and service areas licensed in Auction 66, and in order to better serve the public interest.

In addition, MetroPCS comments on other aspects of the *NPRM* relating to the rules for 700 MHz licenses. In particular, MetroPCS favors the previously established service and performance requirements so that licensees will have the flexibility necessary to build facilities based on their market needs and their own business plans. Furthermore, MetroPCS believes that renewal criteria for licenses in the 700 MHz spectrum should be as predictable as possible, so that licensees are able to plan accordingly. Lastly, MetroPCS proposes that the 700 MHz license

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A	746-747, 776-777			2 MHz		2 x 1 MHz		MEA		52*		
B	762-764, 792-794			4 MHz		2 x 2 MHz		MEA		52*		
C	747-752, 777-782			10 MHz		2 x 5 MHz		EAG		52/36		
D	752-757, 782-787			10 MHz		2 x 5 MHz		EAG		17/6		
E	757-762, 787-792			10 MHz		2 x 5 MHz		MEA		52		

*Light Grey highlighted blocks have been auctioned. [Redacted]

Attachment 1 hereto, contains a chart which compares the current FCC plan, the RTG proposal, the USCC proposal and the MetroPCS plan for both the upper 700 and lower 700 MHz bands. The Commission will note a considerable degree of conceptual similarities between the RTG, USCC and MetroPCS plans. They share the common elements of supporting the inclusion of smaller service areas and, in most instances, the critical need for smaller (i.e., 10 MHz to 12 MHz) spectrum blocks. MetroPCS does, however, suggest a few alterations. The reasons for the variations suggested by MetroPCS are as follows.

With regard to the lower band, MetroPCS suggests utilizing the REAG license area utilized in Auction 66 for the Block A paired channel rather than the 700 MHz EAG defined by the Commission.³² MetroPCS sees a benefit in replicating to the extent

³² Economic Area Groupings ("EAGs") are separated into 6 distinct areas that together cover the United States. This is in contrast to the regional economic area groupings ("REAGs") utilized by the Commission in the recently concluded advanced wireless spectrum ("AWS") auction. ("Auction 66"). REAGs are separated in 12 distinct areas that together cover the United States.

UPPER 700 MHZ BAND PLANS

Current FCC Plan – Upper 700 MHz Band

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746	752	758	764	770	776	782	788	794	800	806
Block	Frequencies			Bandwidth	Pairing	Area Type	Licenses			
A	746-747, 776-777			2 MHz	2 x 1 MHz	MEA	52*			
B	762-764, 792-794			4 MHz	2 x 2 MHz	MEA	52*			
C	747-752, 777-782			10 MHz	2 x 5 MHz	700 MHz EAG	6			
D	752-762, 782-792			20 MHz	2 x 10 MHz	700 MHz EAG	6			

RTG Proposal of 09/27/05 – Upper 700 MHz Band

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A	C	D	B	Public Safety		A	C	D	B	Public Safety
CH. 60	CH. 61	CH. 62	CH. 63	CH. 64	CH. 65	CH. 66	CH. 67	CH. 68	CH. 69	

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Block	Frequencies			Bandwidth	Pairing	Area Type	Licenses			
A	746-747, 776-777			2 MHz	2 x 1 MHz	MEA	52*			
B	762-764, 792-794			4 MHz	2 x 2 MHz	MEA	52*			
C	747-752, 777-782			10 MHz	2 x 5 MHz					
D	752-762, 782-792			20 MHz	2 x 10 MHz	700 MHz EAG	6			

USCC Proposal of 02/13/06 – Upper 700 MHz Band

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A	C		B	Public Safety		A	C		B	Public Safety
CH. 60	CH. 61	CH. 62	CH. 63	CH. 64	CH. 65	CH. 66	CH. 67	CH. 68	CH. 69	

746	752	758	764	770	776	782	788	794	800	806
Block	Frequencies			Bandwidth	Pairing	Area Type	Licenses			
A	746-747, 776-777			2 MHz	2 x 1 MHz	MEA	52*			
B	762-764, 792-794			4 MHz	2 x 2 MHz	MEA	52*			
C	747-752, 777-782			10 MHz	2 x 5 MHz	GMA	734			
D	752-757, 782-787			10 MHz	2 x 5 MHz	EA	176			
E	757-762, 787-792			10 MHz	2 x 5 MHz	MEA	52			

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A	746-747, 776-777			2 MHz	2 x 1 MHz	MEA	52*			
B	762-764, 792-794			4 MHz	2 x 2 MHz	MEA	52*			
C	747-752, 777-782			10 MHz	2 x 5 MHz	EA	52/176			
D	752-757, 782-787			10 MHz	2 x 5 MHz	EA	176			
E	757-762, 787-792			10 MHz	2 x 5 MHz	MEA	52			