

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of

Service Rules for the 698-746, 747-762 and  
777-792 MHz Bands

WT Docket No. 06-150

Revision of the Commission's Rules to  
Ensure Compatibility with Enhanced 911  
Emergency Calling Systems

CC Docket No. 94-102

Section 68.4(a) of the Commission's Rules  
Governing Hearing Aid-Compatible  
Telephones

WT Docket No. 01-309

**Reply Comments of WiMAX Forum**

The WiMAX Forum™ is the world's leading organization promoting global standardization for, and adoption of, metro-scale wireless broadband networks. The WiMAX Forum's charter is to promote and certify the compatibility and interoperability of broadband wireless access equipment that conforms to the Institute for Electrical and Electronics Engineers (IEEE) 802.16 and ETSI HiperMAN standards. As such, the organization shares the Commission's appreciation and acknowledgement that wireless broadband networks are an effective and rapid means to provide high data rate connectivity to communities and organizations across the U.S. to meet the growing needs of the consumer markets. Along these lines, the WiMAX Forum works closely with service providers and regulators to ensure that WiMAX Forum Certified systems meet customer and government requirements. The WiMAX Forum respectfully submits these comments in response to the service rules for the 698-746, 747-762 and 777-792 MHz band in the above-captioned proceeding.

In the current rulemaking proceeding, the Commission seeks comments on potential changes to several of its rules regarding the use of both the lower and upper 700 MHz bands. The WiMAX Forum believes that wireless services will continue to be an increasing part of broadband service deployment. Consumers are increasingly demanding access to broadband services any time they want it, wherever they want it. This spectrum will help bring new technology and services to consumers everywhere and more opportunities to use these services both at home, in the office and on the go. The WiMAX Forum was established to help remove barriers to wide-scale adoption on a global basis of Broadband Wireless Access (BWA) technology. Hence, the Commission's choice technical rules resulting from this rulemaking is of great interest.

Many member companies of the WiMAX Forum have provided comments regarding the licensing and technical rules under consideration.<sup>1</sup> The WiMAX Forum strongly supports that any changes to the Commission rules are done on a technology neutral approach, and proposals which are adopted should expand rather than limit deployment options for commercial services.

Respectfully Submitted  
WiMAX Forum

/s/ Tim Hewitt

October 19, 2006

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<sup>1</sup> See comments of AT&T Inc., Motorola Inc., NextWave Broadband Inc and Sprint Nextel Corporation.