

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of )  
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FCC Seeks Comment on Recommendations ) IB Docket No. 04-286  
Approved by the Advisory Committee For the )  
2007 World Radiocommunication Conference )

**COMMENTS OF ERICSSON INC**

To: The Commission  
**Attention: International Bureau**

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October 27, 2006

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### COMMENTS OF ERICSSON INC

Ericsson Inc (“Ericsson”) submits these Comments in response to the FCC’s Public Notice in the above-referenced docket.<sup>1</sup> The FCC seeks comment on the recommendations of the World Radiocommunication Advisory Committee (“WRC-07 Advisory Committee”).<sup>2</sup> The FCC also seeks comment on the draft preliminary views and proposals that have been developed by the Executive Branch Agencies and submitted to the FCC by the National Telecommunications and Information Administration (NTIA).<sup>3</sup> Finally, the FCC seeks comment on the International Bureau’s initial conclusions with regard to the WRC-07 Advisory Committee recommendations.<sup>4</sup>

Based on the recognized need by the NTIA and FCC to evaluate new approaches and techniques to increase spectrum sharing, and the preliminary nature of WP8F spectrum sharing studies, it is too early to conclude that the candidate bands 2700-2900 MHz, 3400-4200 MHz and 4400-4990 MHz should be removed from consideration for commercial terrestrial mobile services.

Resolution 228 (WRC-03) calls for studies on frequency-related matters for the future development of IMT-2000 and systems beyond IMT-2000 (IMT-Advanced) as defined by ITU-R.<sup>5</sup> Resolve 2 under Resolution 228 (WRC-03) invites the ITU-R to report, in time for WRC-07, on the results of studies on the spectrum requirements and

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<sup>1</sup> See *FCC Seeks Comments on Recommendations Approved by the Advisory Committee for the 2007 World Radiocommunication Conference*, IB Docket No. 04-286, Public Notice, DA 06-2013 (re. Oct. 12, 2006) (“Public Notice”).

<sup>2</sup> *Id.* at 1.

<sup>3</sup> *Id.*

<sup>4</sup> *Id.*

<sup>5</sup> See, e.g., *id.* at 16.

potential frequency ranges suitable for the future development of IMT-2000 and systems beyond IMT-2000.<sup>6</sup> It is recognized that the recommendations that are attached to the *Public Notice* may evolve in the course of interagency discussions as WRC-07 nears, and therefore do not constitute final U.S. Government positions on any issue.<sup>7</sup>

However, Ericsson is concerned that recommendation decisions to exclude specific candidate bands have been made based on sharing studies that are still in development. This is contrary to the intent expressed in the U.S. Draft proposal on agenda item 1.4 that decisions be based on completed technical studies. As that proposal stated: “[I]n order to identify additional spectrum to meet IMT-Advanced requirement, compatibility with existing services in the bands of interest must be demonstrated through ITU-R technical studies. However, at this time such studies have not been completed.”<sup>8</sup>

Analyses of the issues relevant to spectrum requirements and frequency ranges are still underway. In many cases, the current sharing studies have addressed a limited number of scenarios, mainly macro base stations and locations outdoors. Other scenarios are still under consideration. Mitigation techniques are still being investigated and have yet to be incorporated into all the studies. Additionally, recent studies submitted to WP8F on co-existence between IMT and radar in the 2700-2900 MHz band that consider scenarios with micro and pico cells and certain mitigation techniques indicate that sharing might be possible. Similar results exist also for the 3400-3700 MHz band (for certain scenarios).

Other key issues remain to be resolved. For example, the Radio Regulation Footnote 5.433 urges all administrations operating radiolocation systems in the band 3400-3600 MHz to cease operations by 1985. This change is not reflected in the US draft

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<sup>6</sup> *Id.*

<sup>7</sup> *Id.* at 1.

<sup>8</sup> *See, e.g., id.* at 16.

proposal. Several parts of the bands are also designated for mobile service. Therefore, any general conclusions, as demonstrated in several of the bands documented in the Table of Allocations with “NOC,” must be considered preliminary, particularly decisions that exclude the 2700-2900 MHz, 3400-4200 MHz and 4400-4990 MHz bands from consideration.

In March 2004, the President announced that all Americans should have universal, affordable access to broadband technology by 2007. Some of the most promising new broadband technologies are wireless. Technologies such as EV-DO, WCDMA/HSPA, WiMAX, CDMA2000, OFDM and LTE are increasingly seen as last-mile broadband solutions that can be used effectively to achieve the President’s goal of broadband access for all Americans by 2007. However, the demand for spectrum to support commercial services as well as critical government missions such as national defense, public safety, homeland security, scientific research, and other uses has continued to increase dramatically.

The FCC and NTIA are taking a number of steps to evaluate new approaches and techniques to increase efficient domestic and international uses of the spectrum. These initiatives include identifying and implementing incentives to improve the efficiency of both government and private sector spectrum use. Specifically, NTIA, with the assistance of the federal agencies and the FCC, will examine the feasibility of sharing spectrum among commercial, Federal and local public safety, and critical infrastructure applications through a public safety demonstration program. In addition, NTIA plans to conduct a pilot program to evaluate approaches and techniques to increase spectrum sharing between Federal and non-Federal spectrum users.”

Based on the recognized need by the NTIA and FCC to evaluate new approaches and techniques to increase spectrum sharing, and the preliminary nature of the WP8F spectrum sharing studies, it is too early to conclude that the candidate bands 2700-2900 MHz, 3400-4200 MHz and 4400-4990 MHz should be removed from consideration for commercial terrestrial mobile services.

Respectfully submitted this 27th day of October, 2006.

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