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**Donald C. Brittingham**  
Director – Wireless/Spectrum Policy

January 23, 2007

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room TW-A325  
Washington, D.C. 20554

**Re: *Ex Parte* Presentation  
IB Docket No. 04-286; “WRC-07 Advisory Committee”**

Dear Ms. Dortch:

On January 22, 2007, Drew Delaney of Alcatel-Lucent, Barbara Baffer of Ericsson and the undersigned met with Catherine Bohigian and Elizabeth Andrion of the Office of Strategic Planning and Policy Analysis to discuss preparations for the 2007 World Radiocommunication Conference.

We discussed a recommendation that was made to Informal Working Group 3 (IWG-3), View A on Agenda Item 1.4, which was recently approved by the FCC’s WRC-07 Advisory Committee. (*Public Notice DA 07-26*). This recommendation is supported by the companies listed above, as well as other companies listed in the attachment, who were unable to attend the meeting.

The proponents of View A believe that the identification of the 700 MHz band in accordance with Agenda Item 1.4 is important to the growth of advanced wireless services, and that it is extremely important for the U.S. government to adopt a strong position in support of 700 MHz for WRC-07. We noted in the meeting why we believe View A is the best means to accomplish that objective.

Pursuant to Section 1.1206(b)(2) of the Commission’s Rules, an electronic copy of this letter is being filed for inclusion in the above-referenced docket.

Sincerely,

/s/ Donald C. Brittingham \_\_\_\_\_  
Donald C. Brittingham

cc: Catherine Bohigian  
Elizabeth Andrion

## Industry Proposal for WRC-07 (“View A”)

- The US is currently preparing for the October 2007 World Radiocommunication Conference (“WRC-07”), where nations agree on international uses of spectrum under the auspices of the United Nations.
  - Industry has been working closely with the FCC to prepare for the Conference through its WRC Advisory Committee (“WAC”).
  - Industry-government preparations will continue through the upcoming Conference Preparatory Meeting (“CPM”), scheduled for February, and throughout the year leading up to the WRC.
- One important issue to be considered at WRC-07 is the identification of additional spectrum for advanced wireless services.
  - This is included under Agenda Item 1.4 which asks the WRC “*to consider frequency-related matters for the future development of IMT-2000 and systems beyond IMT-2000 taking into account the results of ITU-R studies in accordance with Resolution 228 (Rev. WRC-03)*”.
  - Spectrum for IMT-2000 (commonly referred to as “3G”) was identified at the 1992 WRC (PCS band) and again at the 2000 WRC (1.7 and 2.5 GHz bands as well as cellular and SMR bands at 800 MHz already being used in the US).
  - Additional spectrum is needed to accommodate the continued growth of wireless services, including the continued advancements of technologies that support higher data rates.
- Our proposal (“View A”) would (1) allocate the 698-806 MHz (“700 MHz”) band to the mobile service on a worldwide basis; (2) identify the band for IMT (rather than IMT-2000); and (3) change the identifications for all existing bands to IMT.
  - The 700 MHz band, the next major spectrum to be auctioned for commercial services in the US, is important to U.S. operators and vendors. (Note: While the U.S. has considered numerous other bands for identification, no other bands have been deemed suitable).
  - Worldwide identification of this band is critical to achieving the economies of scale that will drive lower costs and greater choice in equipment, benefiting U.S. consumers.
  - Identification of the band for IMT, instead of IMT-2000, recognizes the continued evolution of technology as the term IMT is defined by the ITU to include IMT-2000, its future development, and systems beyond IMT-2000. As a result, the identification of the band for IMT will ensure a flexible and technology neutral approach.

- There is consensus agreement within the industry to allocate and identify the 700 MHz band at the upcoming WRC and to modify the footnotes so that all existing bands are treated in a comparable manner.
- However, there is some disagreement about how these bands should be identified.
  - An alternative proposal (“View B”) would identify this spectrum for “IMT and other broadband wireless access systems.”
  - We oppose this form of identification for two primary reasons.
  - First, the agenda item is focused on IMT, not Broadband Wireless Access (“BWA”). An attempt by the U.S. to expand the agenda item to include BWA would be viewed as highly unusual and would likely face substantial opposition from other administrations.
  - Second, there are no studies to support the inclusion of BWA in the agenda item. As the agenda item indicates, any proposals must take into account the results of ITU-R studies in accordance with Resolution 228 (adopted at the 2003 WRC). Those studies were undertaken long ago for IMT, but not for BWA. Attempting to include BWA in the agenda item at this late date, without having done any of the supporting studies as required by the 2003 WRC, would be disruptive to the Conference and would have a negative impact on overall U.S. efforts at the Conference.
- View B, if adopted by the US, would be highly controversial in the international arena due to its content and very late timing. It could potentially jeopardize the global allocation of the 700 MHz band at the WRC, which already faces challenges in gaining international support.
- View A is consistent with long-standing U.S. positions at previous WRCs and within ITU-R Working Party 8F, the lead group on Agenda 1.4. The change proposed in View B does not have consensus among U.S. industry and does not have support from any other administrations.
- Alcatel-Lucent, CDG, Cingular, Ericsson, Nokia, Qualcomm, T-Mobile, TMG and Verizon urge the FCC to stick with long-standing U.S. positions at the CPM and WRC to ensure U.S. success in seeing 700 MHz identified by WRC-07.