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

In the Matter of	)	
	)	
Recommendations Approved by the Advisory Committee for the 2007 World Radiocommunication Conference	)	IB Docket No. 04-286
	)	

JOINT COMMENTS OF

3G AMERICAS, AT&T, ALCATEL-LUCENT, CDMA DEVELOPMENT GROUP, ERICSSON, NOKIA, QUALCOMM, T-MOBILE, TELECOMMUNICATIONS MANAGEMENT GROUP AND VERIZON WIRELESS

3G Americas, AT&T, Alcatel-Lucent, CDMA Development Group, Ericsson, Nokia, QUALCOMM, T-Mobile, Telecommunications Management Group, and Verizon Wireless (collectively, the "Parties" or the "Proponents of View A") jointly submit these comments in response to the FCC's Public Notice which seeks comment on recommendations recently approved by the Advisory Committee for the 2007 World Radiocommunication Conference ("WRC-07").[1] These comments are limited to recommendations related to 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)."[2]

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[1] *FCC Seeks Comment on Recommendations Approved by the Advisory Committee for the 2007 World Radiocommunication Conference*, Public Notice, DA 07-26, rel. Jan. 9, 2007.

[2] *Administrative Circular CA/128*. International Telecommunication Union – Radiocommunication Bureau (ITU-R), rel. July 29, 2003, at Annex 1, Resolution 802, Agenda for the 2007 World Radiocommunication Conference, available at http://www.fcc.gov/ib/wrc-07/.

The Parties submitted a proposal for this agenda item ("View A") to Informal Working Group 3 ("IWG-3") that was among those recently approved by the Advisory Committee. This proposal would (1) allocate the 698-806 MHz band to the Mobile Service on a worldwide basis; (2) identify the band for International Mobile Telecommunications ("IMT"); and (3) modify existing footnotes for frequency bands currently identified for IMT-2000 to reflect a new IMT identification.[3]

The identification of additional spectrum in accordance with Agenda Item 1.4 is important to the future growth of advanced wireless services, both within the United States and throughout the world. Commercial mobile services and technologies have advanced considerably in recent years. Today, wireless technologies support a variety of services including voice, high-speed data, video, and other multimedia applications. Examination of the global marketplace for "Third Generation" services provides evidence of this significant growth.[4] In the future, the demand for broadband wireless services will increase, and advanced technologies are being developed, and will continue to be developed, to meet this demand. While these advanced technologies are becoming increasingly spectrum efficient, more spectrum will be needed in the future to support these spectrum-intensive applications. From an international perspective, assessment of user needs and demands in Reports ITU-R M.2072 and ITU-R M.2078 clearly indicates a

[3] View A was developed by the Parties, with the exception of 3G Americas and T-Mobile, and submitted to Informal Working Group 3 as part of the Advisory Committee's WRC preparatory process. While 3G Americas and T-Mobile were not authors of the View A proposal, they fully support its adoption.

[4] International Mobile Telecommunications-2000 ("IMT-2000") is the global standard for "Third Generation" mobile services, which are commonly referred to as "3G."

need for more spectrum.[5] In the United States, the recent success of the FCC's Advanced Wireless Service ("AWS") auction and the high interest in the upcoming 700 MHz auction are further evidence of the continued need for additional spectrum to support advanced wireless services in the future.

Various alternative frequency bands have been considered within the United States for possible identification. These include 410-430 MHz, 450-470 MHz, 470-806 MHz, 2300-2400 MHz, 2700-2900 MHz, 3400-4200 MHz, and 4400-4900 MHz. Unfortunately, many of these bands present challenges in identifying for use with advanced wireless services in the United States because of the potential impact on incumbent uses in those bands.

The 698-806 MHz band, however, is especially well suited for identification at this year's WRC. In the United States, the band has already been allocated for mobile services and will be made available for new broadcast services, commercial mobile services, and public safety services as part of a comprehensive plan to transition to digital television. Due to its favorable propagation characteristics, it also would provide significant coverage benefits and cost efficiencies, especially in areas with low population densities. These benefits are important considerations for any administrations wishing to deploy wireless technologies, but are especially important to developing countries, which may have spectrum available but not have the resources to deploy nationwide systems in the higher frequency ranges already identified by the ITU for

[5] *World Mobile Telecommunications Market Forecast*, Report ITU-R M.2072, Question ITU-R 229/8 (2005); *Spectrum Requirements for the Future Development of IMT-2000 and IMT-Advanced*, Report ITU-R M.2078, Question ITU-R (2006).

IMT-2000. Resolution 228, which was revised at the 2003 WRC, specifically asked the ITU to take these considerations into account by considering spectrum below 806 MHz.[6]

The adoption of View A would provide the U.S. government with the strong position that is necessary for going into the upcoming WRC. The worldwide allocation and identification of 698-806 MHz would provide the additional spectrum that is necessary to support the future development of advanced wireless services, and would be fully consistent with spectrum management plans already put in place in the United States. Such an allocation/identification is important to achieving the economies of scale that will drive lower costs and greater choice in the global equipment marketplace, which would yield substantial benefits to wireless consumers.

In addition to providing the additional spectrum that is needed, adoption of View A would also provide a flexible and forward-looking approach for the development of advanced wireless equipment in a variety of frequency bands, including 698-806 MHz, and would ensure that all bands have consistent regulatory treatment. Identification of these bands for IMT, rather than IMT-2000, recognizes the continued evolution of technology and the need to ensure that the regulatory language of the ITU is sufficiently flexible to accommodate these changes.

Within the IMT-2000 framework, the ITU-R has already begun to address such a need by considering appropriate naming for the future development of IMT-2000 and systems beyond IMT-2000. Specifically, Study Group 8 has developed a new Draft Resolution ITU-R M.[IMT.NAME], "Naming for International Mobile

[6] *Resolution 228 (Rev. WRC-03), Studies to consider requirements for the future development of IMT-2000 and systems beyond IMT-2000 as defined by ITU-R*, adopted by the ITU-R at the 2003 WRC.

Telecommunications," for consideration by the Radiocommunication Assembly 2007 with active participation and support by the United States. This Draft Resolution specifies the nomenclature for the future development of IMT-2000 and systems beyond IMT-2000 through names uniquely associated with the advancement and continuation of IMT. In particular, it resolves that the term IMT-2000 encompasses also its enhancements and future developments and that the new name IMT-Advanced be applied to those systems, system components, and related aspects that include new radio interface(s) that support the new capabilities of systems beyond IMT-2000. It also resolves that the term IMT be the root name that encompasses both IMT-2000 and IMT-Advanced collectively.

View A is consistent with this proposed naming convention. By identifying the 698-806 MHz band for IMT, rather than IMT-2000, View A would identify the spectrum in a manner consistent with the proposed naming convention, and would ensure a flexible and technology neutral approach. Moreover, by similarly modifying the footnotes for frequency bands currently identified for IMT-2000, View A would ensure that all frequency bands receive comparable treatment.

The Proponents of View A believe there is consensus agreement within the industry that the 698-806 MHz band be allocated to the Mobile Service on a worldwide basis and identified for IMT. However, some within the industry have advocated that the U.S. position should <u>also</u> identify the 698-806 MHz band for "other broadband wireless access systems." This separate proposal was submitted to the WRC Advisory Committee as "View B."

There are two fundamental problems with the View B proposal. First, it is not responsive to the WRC agenda item in question. Agenda Item 1.4 is about "the future development of IMT-2000 and systems beyond IMT-2000." It is not about broadband wireless access ("BWA"), a new and controversial concept to introduce so late into the WRC process. A United States proposal for the Conference that would use Agenda Item 1.4 to identify spectrum for BWA would face substantial opposition and, as a result, would undermine the overarching objective of identifying this critical spectrum.

Second, studies have not been conducted to support the inclusion of BWA systems in the agenda item. All of the work that has been done over the last three years since the last WRC in support of identification of new spectrum has considered only "the future development of IMT-2000 and systems beyond IMT-2000." Without the supporting studies, as required by Agenda Item 1.4, the addition of BWA to any U.S. proposal will be unacceptable to the Conference. For the United States to propose such an addition without having done the necessary preparatory work or without even having proposed the work to be undertaken would be disruptive to the Conference and would have a negative impact on U.S. efforts in advancing positions on this agenda item, as well as others. The United States should not support such a proposal.

In summary, the Parties believe that it important for the United States to develop a proposal for the 2007 World Radiocommunication Conference that would allocate and identify additional spectrum to support the continued growth of advanced wireless services. We believe that the 698-806 MHz band represents the best candidate for such a proposal because it would be consistent with spectrum management decisions already made in the United States and would be responsive to the ITU's request to consider

frequency bands below 800 MHz. Identification of the band for IMT would ensure a flexible, forward-looking and technology neutral approach for identifying the spectrum. In addition, modifying existing footnotes for bands currently identified for IMT-2000 to reflect an IMT identification would ensure that this flexible approach applies to all bands in a similar manner. The Parties urge the adoption of View A.

Respectfully submitted,

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