

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 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
	)	
Biennial Regulatory Review – Amendment of Parts 1, 22, 24, 27, and 90 to Streamline and Harmonize Various Rules Affecting Wireless Radio Services	)	WT Docket No. 03-264
	)	
Former Nextel Communications, Inc. Upper 700 MHz Guard Band Licenses and Revisions to Part 27 of the Commission's Rules	)	WT Docket No. 06-169
	)	
Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band	)	PS Docket No. 06-229
	)	
Development of Operational, Technical and Spectrum Requirements for Meeting Federal, State and Local Public Safety Communications Requirements Through the Year 2010	)	WT Docket No. 96-86
	)	

**COMMENTS**

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## EXECUTIVE SUMMARY

WCA applauds the Commission's determination to move forward with the adoption of rules that will allow the 700 MHz band to be used in a manner that best serves the needs of the public safety and commercial sectors. While the eleventh-hour *Further Notice* is necessary to assure that these dual objectives are met, these proceedings must be completed promptly so that the auction can commence on the Congressionally-mandated schedule, while still providing prospective auction participants approximately six months they need to prepare for the auction.

Several steps are necessary to ensure that public safety entities can take advantage of the 700 MHz spectrum for delivering the narrowband and broadband services that are critical to public safety functions. First, the Commission should proceed with its proposed consolidation of the public safety narrowband spectrum at the top end of the public safety band and public safety broadband spectrum at the bottom end of the public safety band, with an internal guardband placed between the public safety narrowband and broadband spectrum allocations that is sufficient to protect public safety narrowband communications from harmful interference.

Second, the Commission should adopt an Upper 700 MHz band plan that will allow homogeneous allocation of public safety narrowband and public safety broadband in all areas of US, including border regions adjacent to Canada & Mexico. Band plan proposals 3, 4, and 5 accomplish this objective. Band plan proposals 1 and 2, however, are inconsistent with the principle of nationwide, homogeneous allocation of public safety narrowband and public safety broadband spectrum, fail to meet the need for public safety narrowband interoperability, and should be rejected.

Third, assuring nationwide interoperability within the public safety band is essential. Sanctioning a national public safety organization as licensee and overseer of the public safety broadband spectrum is a viable approach to ensure that broadband systems deployed within the public safety broadband spectrum enable nationwide interoperability. However, there remain significant details to be worked out for a nationwide public safety broadband network to be implemented. These details include ensuring that a national public safety broadband network also meets the individual and unique needs of local and regional public safety entities across different types of agencies and different demographics, as well as defining who ultimately has control of the public safety broadband spectrum and/or various functions of the network in a given geographical area. To be successful, a nationwide network must meet the operational and reliability needs of public safety, while also being economically sound and financially viable.

Fourth, because the buildout of a nationwide public safety broadband network may require up to 10 years, the Commission should take steps to ensure that public safety organizations' needs are not put on hold during this interim period. Local or regional public safety agencies should be accorded the flexibility, in coordination with the nationwide public safety licensee, to deploy local or regional networks utilizing the full 2x5 MHz of paired spectrum that can later be integrated into the nationwide network. This flexibility is likely to be especially important in areas, including many rural areas, in which the national public safety broadband network is likely to be implemented later in the schedule.

To ensure that commercial 700 MHz systems are rapidly and efficiently deployed, the Commission should ensure that the final 700 MHz commercial band plan provides a broad mix of license sizes (both in geography and channel width) across all of the Upper and Lower 700

MHz spectrum, including at least one EA license in each of the Upper and Lower commercial bands. The Commission should also maintain its policy of technology and service neutrality, ensuring that the 700 MHz commercial band plan selected does not inhibit the deployment of fourth generation wireless broadband technologies or otherwise disadvantage 4G technologies vis-à-vis third generation technologies.

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**COMMENTS**

The Wireless Communications Association International, Inc. (“WCA”)<sup>1</sup> hereby submits its comments in response to the Commission’s *Further Notice of Proposed Rulemaking* concerning the establishment of competitive bidding and service rules for 700 MHz licenses.<sup>2</sup>

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<sup>1</sup> WCA is the trade association of the wireless broadband industry. Its membership includes current and prospective broadband service providers who have an interest in participating in the auction of 700 MHz commercial licenses, as well as system integrators, manufacturers, and vendors of equipment and services that may be used in the provision of public safety and/or commercial services in the 700 MHz band.

## I. DISCUSSION

WCA applauds the Commission's efforts to bring these proceedings to a conclusion that best meets the needs of the public safety and commercial sectors. The complexity of the issues with which the Commission has had to wrestle is evident from the succession of notices of proposed rulemaking and interim reports and orders that have led to this point. While the *Further Notice* was essential to assuring that the Commission achieve its objectives in these proceedings, the time has come to establish the rules that will govern the 700 MHz band.

The deadlines set by Congress for the commercial auction and the deposit of auction proceeds in the Treasury are rapidly approaching.<sup>3</sup> Given the resolve the Commission has shown, WCA is confident that the Commission will fully satisfy those deadlines. Meeting the deadlines will not serve the public interest, however, unless the Commission takes steps to ensure that potential auction participants have sufficient advance notice of the rules to evaluate their options and make financing and business plans. Accordingly, WCA urges the Commission to complete action on a *Report and Order* addressing the issues in the *Further Notice* promptly so that not only will the 700 MHz auction commence no later than the date mandated by Congress, but also prospective auction participants will be provided approximately six months from publication of the final 700 MHz *Report and Order* to the start of the auction. Six months is the *minimum* time

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(footnote continued)

<sup>2</sup> *Service Rules for the 698-746, 747-762, and 777-792 MHz Bands*, WT Docket No. 06-150 *et al.*, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 07-72 (April 27, 2007) (relevant portions referred to as "*Report and Order*" and "*Further Notice*," respectively).

<sup>3</sup> Congress has required the Commission to begin its auction of commercial 700 MHz spectrum by January 28, 2008 and to deposit the auction proceeds in the Treasury by June 30, 2008. Deficit Reduction Act of 2005, Pub. L. 109-171, Title III, 120 Stat. 4 (2006) (Title III is the Digital Television Transition and Public Safety Act of 2005), *cited in Further Notice* at ¶ 2 & n.1.

required for most companies to evaluate their technical and business options, arrange for financing, and settle upon a strategy for participating in the auction.

**A. Reconfiguration of Public Safety Spectrum for Broadband and Narrowband Services**

The Commission has recognized that band plans previously adopted for the public safety spectrum would preclude public safety agencies from using broadband applications that will be increasingly important in their operations. In its *700 MHz Public Safety Eighth Notice*, it proposed aggregating and consolidating the wideband general use, wideband interoperability, and wideband reserve spectrum within the public safety allocation to facilitate broadband public safety communications.<sup>4</sup> The comments overwhelmingly supported the concept of consolidating bands to enable broadband technology.<sup>5</sup> The Commission has now taken the difficult, but essential, step of proposing a reconfiguration of the public safety band to accommodate broadband services. WCA supports this approach, with one relatively minor change to promote spectral efficiency as technology evolves.

The *Further Notice* tentatively concluded that the Commission should reconfigure the 700 MHz public safety spectrum to address the needs of public safety users for access to broadband spectrum.<sup>6</sup> It tentatively found that “providing broadband spectrum for advanced public safety communications would best serve our goal of enabling first responders to protect safety of life, health and property,” and that continuing to allow public safety entities to choose freely be-

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<sup>4</sup> See *Development of Operational, Technical and Spectrum Requirements for Meeting Federal, State and Local Public Safety Communications Requirements Through the Year 2010*, WT Docket No. 96-86, *Eighth Notice of Proposed Rulemaking*, 21 F.C.C.R. 3668, 3675-76 ¶ 13, 3683-84 ¶ 33 (2006) (“*700 MHz Public Safety Eighth Notice*”).

<sup>5</sup> *Further Notice* at ¶ 252.

<sup>6</sup> *Id.* at ¶ 253.

tween wideband and broadband use “could hinder efforts to deploy a nationwide, interoperable broadband network.” Accordingly, it proposed that “only broadband applications consistent with a nationwide interoperability standard” should be allowed in the broadband allocation.<sup>7</sup>

To promote deployment of broadband applications in the public safety spectrum, the *Further Notice* tentatively proposed to reconfigure the band to optimize it for interoperable broadband use.<sup>8</sup> Thus, the Commission tentatively concluded that it would consolidate the existing narrowband public safety allocations to the upper end of the public safety block and designate the lower end of the block for broadband, with a 1 MHz internal guardband at the upper end of the broadband public safety allocation.<sup>9</sup> WCA fully supports this reconfiguration, but suggests one minor refinement.

Rather than specify a fixed 1 MHz internal guardband, WCA suggests that the Commission instead simply require that there be a guardband between the public safety narrowband and public safety broadband spectrum that is sufficient to protect public safety narrowband communications from harmful interference. The internal guardband’s purpose is to act as a “buffer” between these two sub-bands to prevent interference.<sup>10</sup> While a 1 MHz internal guardband may be appropriate for such a buffer *now*, that may not always be the case.

As technology evolves over time, a smaller guardband may provide adequate protection against interference between narrowband and broadband use. Given that this is an *internal* guardband, the appropriate guardband size should be left to the discretion of the public safety

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

<sup>8</sup> *Id.* at ¶¶ 256-57.

<sup>9</sup> *Id.* at ¶ 257.

<sup>10</sup> *Id.*

licensee, consistent with its network technology and internal interference management processes. Fixing the size of the internal guardband by rule may prevent the licensee from using the most efficient and appropriate technology, in the event that a portion of the internal guardband is not needed to address interference effects as technologies advance. The Commission has long recognized that the public interest is generally served by granting licensees technical flexibility, rather than imposing arbitrary technical restrictions that may become obsolete as a result of technological advances.<sup>11</sup> Such an approach is warranted here.

### **B. Upper 700 MHz Public Safety Band Plans**

The *Further Notice* discusses various alternative band plan proposals for the Upper 700 MHz band in connection with commercial services, because most of the variants are designed specifically to accomplish particular configurations of commercial licenses. At the same time, however, some of the band plans (proposals 3, 4, and 5) would shift the location of the public safety spectrum downward slightly.<sup>12</sup> As discussed below, such a shift of public safety spectrum downward would solve the problem of public safety interoperability along the Mexican and Canadian borders that would result if the public safety band remains where it is, as in band plan

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<sup>11</sup> See, e.g., *Amendment of Parts 2 and 22 of the Commission's Rules to Permit Liberalization of Technology and Auxiliary Service Offerings in the Domestic Public Cellular Radio Telecommunications Service*, Gen. Docket 87-390, *Report and Order*, 3 F.C.C.R. 7033 (1988); *Memorandum Opinion and Order*, 5 F.C.C.R. 1138 (1990) (FCC provided flexibility to use alternative technologies, specifying no particular digital standard); *Amendment of the Commission's Rules to Establish New Personal Communications Services*, Gen. Docket 90-314, *Second Report and Order*, 8 F.C.C.R. 7700 (1993); *Memorandum Opinion and Order*, 9 F.C.C.R. 4957 (1994); *Third Memorandum Opinion and Order*, 9 F.C.C.R. 6908 (1994) (FCC provided licensees the "maximum degree of flexibility," specifying no particular technology or air interface standard).

<sup>12</sup> See *Further Notice* at ¶¶ 195-206.

proposals 1 and 2.<sup>13</sup> Accordingly, from the perspective of ensuring public safety interoperability, the Commission should adopt a band plan consistent with proposals 3, 4, and 5. The Commission should, in all events, reject band plan proposals 1 and 2.

In the *Further Notice*, the Commission recognized that after the public safety band plan is reconfigured for broadband, with the narrowband channels at the upper end, there will be conflicts with continued cross-border television operations along the Canadian and Mexican borders that will preclude the use of narrowband channels, including those designated for national interoperability, in some border areas.<sup>14</sup> The current allocation for public safety in the Upper 700 MHz band corresponds to television channels 63, 64, 68, and 69. Canada and Mexico, however, have not finalized their plans for converting all of these channels from television broadcasting to public safety or other land mobile radio use. Canada has finalized an agreement with the U.S. establishing a date for clearing channels 63 and 68, but there has been no date set, and no agreement entered into, for channels 64 and 69.<sup>15</sup> Mexico has not set any date for clearing these four channels, and it currently has television broadcast operations in the border regions on channels 63 and 64.<sup>16</sup> As a result, public safety agencies will only have access to TV channels 63 and 68

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<sup>13</sup> See *id.* at ¶¶ 190-93.

<sup>14</sup> See *id.* at ¶ 260.

<sup>15</sup> Canada has stated that it ultimately intends to clear channels 64 and 69, but it expects to require “a few years” to do so. See Industry Canada, *Policy for the Use of 700 MHz Systems for Public Safety Applications and Other Limited Use of Broadcasting Spectrum*, at 5 (June 2006), cited in *ex parte* letter from Michael McMEnamin, Senior Manager, Alcatel-Lucent, WT Dockets 96-86 and 06-169 and PS Docket 06-229, at 11 n.23 (April 6, 2007).

<sup>16</sup> See Protocol Between the Department of State of the United States of America and the Secretariat of Communications and Transportation of the United Mexican States Concerning the Allotment and Use of the 698-806 MHz Band for Terrestrial Non-Broadcasting Radiocommunication Services Along the Common Border.

on the U.S. side of the border along portions of the boundary with Canada and will be precluded from using TV channels 63 and 64 at some locations along the boundary with Mexico.

The interoperability problem arises when the narrowband channels designated by the FCC for interoperability<sup>17</sup> fall entirely within channels 64 and 69. These channels will, for the foreseeable future, be used for television broadcasting at locations on the Canadian and Mexican sides of the borders, precluding their use by public safety agencies in the affected areas.

Two of the band plans proposed in the *Further Notice* — band plan proposals 1 and 2 — have the public safety narrowband interoperability channels falling entirely within channels 64 and 69. Recognizing that this placement would preclude the use of the interoperability channels for the foreseeable future in parts of the border region, the Commission sought comment on an interim solution: Within the border areas, narrowband voice channels (presumably including interoperability channels) would be allowed within the 1 MHz of internal public safety guard band at the upper end of channels 63 and 68, temporarily, until being relocated to the narrowband block in channels 64 and 69 once Canada and Mexico have cleared those channels. In effect, the narrowband block would temporarily be shrunk and relocated into the 1 MHz guardband in the border areas. This would have the effect of shifting the guardband down by 1 MHz as well, thus reducing the usable public safety broadband allocation from 5 MHz to 4 MHz.<sup>18</sup> Because of this, the Commission also asked whether it should grant public safety access to a tempo-

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<sup>17</sup> One of the Commission's primary objectives regarding the public safety allocation in the Upper 700 MHz spectrum has been to provide interoperability between the various national public safety organizations across a region, across the country, and between the U.S. and its border nations.

<sup>18</sup> *Further Notice* at ¶ 261 & n.531.

rary “easement” to regain 5 MHz of broadband spectrum by extending 1 MHz into the adjacent commercial allocation.<sup>19</sup>

This temporary solution would eliminate true interoperability. It results in public safety licensees in some areas using “interoperability” channels that would not be interoperable with the remainder of the U.S. The interim solution creates the potential that radios coming into the border areas from elsewhere to assist in times of crisis would be programmed the standard interoperability channels, within television channels 64 and 69, while the radios of public safety agencies already operating within the border areas would be using “interoperability” channels within television channels 63 and 68.<sup>20</sup> Such radios would employ different “interoperability” channels and would not be able to communicate. This result, even if temporary, goes directly against the rationale for designating interoperability channels in the first place. To avoid such incompatibility on the interoperability channels, the interoperability channel assignments need to be uniform across the U.S. and coordinated and fixed between the U.S. and Mexico and Canada. To accomplish this under band plan proposals 1 and 2 would require all public safety licensees nationwide, not only those in the border region, to shift their interoperability channels downward and then shift back upward after Canada and Mexico have cleared the relevant channels.<sup>21</sup>

In short, WCA does not believe the public interest in public safety interoperability will be well served by interim shifts of public safety allocations, either wholly within the existing public

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<sup>19</sup> *Id.* at 261 n.531.

<sup>20</sup> This could happen between public safety radios from agencies that are only a few miles from each other — one within the border region and one just outside the border area.

<sup>21</sup> Additionally, this would require that any international agreements that specify the location of the interoperability channels for cross-border coordination would need to be modified twice, once for the temporary solution and again after channels 64 and 69 transition to public safety allocations.

safety allocation (by simply moving the guardband down as a temporary expedient) or by employing temporary public safety “easements” into commercial spectrum. Such measures will result in a lack of uniformity and homogeneity in the public safety allocation, thereby undercutting or even defeating the policy objective of national interoperability, unless the public safety allocation is shifted temporarily downward nationwide. And, in either case, costs associated with shifts in the interoperability channels will be significant. Because the public safety community benefits from Upper 700 MHz band plans that allow homogeneous allocation of public safety narrowband and public safety broadband in all areas of the United States, including the border regions adjacent to Canada and Mexico, WCA supports the use of proposed band plan 3, 4, or 5, and urges the Commission to reject band plans 1 and 2.

**C. Nationwide Interoperability and the Proposed Single National Broadband Public Safety Licensee**

WCA strongly supports the principle of nationwide interoperability within the public safety spectrum band. WCA believes that sanctioning a national public safety organization as licensee and overseer of the public safety broadband spectrum is a viable approach to ensure that the individual broadband systems deployed within the public safety broadband spectrum work together to enable nationwide interoperability. This would be consistent with the Commission’s tentative proposal last December, in its *700 MHz Ninth Public Safety Notice*, to promote nationwide interoperability by licensing the 700 MHz broadband public safety spectrum to a single national public safety broadband licensee.<sup>22</sup>

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<sup>22</sup> *Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band*, PS Docket 06-229 *et al.*, *Ninth Notice of Proposed Rule Making*, 21 F.C.C.R. 14837, 14843 ¶ 19 (2006) (“*700 MHz Public Safety Ninth Notice*”).

However, should the Commission license a single national overseer of the public safety broadband spectrum, that represents only the beginning of an ongoing process. Significant details need to be worked out satisfactorily in order for a nationwide public safety broadband network to be implemented, with the involvement of the national overseer, the regional planning councils (“RPCs”), the existing 700 MHz public safety licensees, and the many individual public safety entities and non-governmental organizations (“NGOs”) that will be participating in both broadband and narrowband public safety operations at 700 MHz.

Among the details to be negotiated are ensuring that a national public safety broadband network also meets the individual, unique needs of local and regional public safety entities, including many different types of agencies and covering different demographics, as well as defining who ultimately has control of the public safety broadband spectrum and/or various functions of the network in a given geographical area. These matters should be left to the affected public safety entities to work out in a mutually acceptable way, rather than being decided *a priori* by the Commission without a thorough understanding of all of the factors that may be involved in each area.

To be successful, a nationwide network must meet the operational and reliability needs of public safety, while also being economically sound and financially viable, whether it is overseen by a single national public safety licensee or in some other manner. As the Commission recognized in its *700 MHz Public Safety Ninth Notice*, cost effectiveness is a key concern.<sup>23</sup> The Commission should, therefore, require the proposed operator of a national public safety network to demonstrate not only its technical and operational qualifications, but also its financial qualifi-

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<sup>23</sup> 21 F.C.C.R. at 14844 ¶¶ 22-24.

cations and the viability of its business plans, including its plans and timetable for coverage of rural areas.

**D. Flexibility for Local and Regional Public Safety Licensees**

While WCA certainly endorses the Commission's determination that there should be a national interoperable public safety network using the broadband spectrum at 700 MHz, it is essential to recognize that national interoperability is not the only objective to be served by the broadband public safety allocation. The broadband services that the Commission seeks to foster will, much of the time, be used by local and state public safety agencies to address matters of local, not national, importance.

As a practical matter, buildout of a nationwide public safety broadband network may require up to 10 years. Local and state public safety agencies should not have to wait until the national licensee has gotten around to building out in their areas before they can reap the benefits of broadband public safety communications. Accordingly, the Commission should allow local or regional public safety agencies the flexibility, in coordination with the nationwide public safety licensee, to deploy local or regional networks using the full 2×5 MHz of paired spectrum, pending buildout of a nationwide network.

This flexibility is likely to be especially important in areas, particularly rural areas, in which a national public safety broadband network is likely to be implemented later, rather than sooner. A national public safety network overseer, seeking to build its network in a fiscally responsible manner, will need to build out in stages, and this is likely to result in its network being deployed most rapidly in the areas that have the largest populations, where the broadband services will be used most intensively. Less densely populated areas, and especially rural areas,

nevertheless have a need for the advanced services that can be provided on a broadband network. Allowing state and local public safety agencies the flexibility to deploy their own networks before the national network “comes to town,” in coordination with the national licensee and subject to a later transition to the national interoperability network when it is deployed, will bring rural America the homeland security, health, and public safety benefits of advanced wireless communications without needless delay.

### **E. Commercial License Sizes and Technologies**

Consistent with its commitment to carrying out the objectives set forth by Congress in Section 309(j)(3), the Commission has considered licensing commercial 700 MHz service providers for variously sized geographic areas and spectrum allotments. In the *Report and Order*, the Commission found “that providing for a mix of geographic licensing areas in the 700 MHz Band will balance the demand for differently sized licenses demonstrated in the record and enhance access to this spectrum by a variety of potential licensees.”<sup>24</sup> Pursuant to this approach, the *Further Notice* sets forth various alternative band plans containing different mixes license sizes varying by amount of spectrum and geographic area.

WCA supports the adoption of a final 700 MHz commercial band plan that provides a broad mix of license sizes (both in geography and channel width) across all of the Upper and Lower 700 MHz spectrum bands. In particular, WCA supports the availability of at least one block of spectrum licensed on the basis of EAs in each of the Upper 700 MHz and Lower 700 MHz bands of commercial spectrum. This approach will allow companies of various sizes, with a variety of business plans, to compete for spectrum. Smaller block sizes will create more opportunities for new entrants, allow established carriers greater flexibility in supplementing their de-

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<sup>24</sup> *Report and Order* at ¶ 42.

ployed systems, and afford small and rural businesses greater flexibility in entering the 700 MHz spectrum.

To date, the Commission has wisely followed the path of technology and service neutrality in its commercial 700 MHz proceedings, not endorsing one potential use of spectrum over others, within broad limits. The Commission's *Upper 700 MHz First Report and Order* started down this path by allocating spectrum under a flexible use paradigm, seeking to "fulfill[] the need for a variety of wireless services," and not favor and "establish particular service configurations. Rather, the service rules allow licensees to make determinations respecting the services provided and technologies to be used . . . ." <sup>25</sup> That order also emphasized "the band's suitability for uses ranging from wideband mobile communications to innovative, fixed wireless Internet access services and new broadcast-type services."<sup>26</sup> Carrying this philosophy forward, the *Report and Order* rejected requests to tailor its technical rules to favor a particular service or technology, within the bounds necessary for prevention of interference.<sup>27</sup>

WCA urges the Commission to continue its technology and service agnosticism in establishing its band plan for the 700 MHz commercial band plan. In particular, the band plan selected should not inhibit the deployment of fourth generation wireless broadband technologies, or otherwise disadvantage 4G broadband technologies vis-à-vis third generation technologies.

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<sup>25</sup> *Service Rules for the 746-764 and 776-794 MHz Bands, and Revisions to Part 27 of the Commission's Rules*, WT Docket 99-168, *First Report and Order*, 15 F.C.C.R. 476, 483 ¶ 15 (2000) (*Upper 700 MHz First Report and Order*).

<sup>26</sup> *Id.* at 485 ¶ 18.

<sup>27</sup> *See, e.g., Report and Order* at ¶¶ 91 ("To better accommodate all technologies, we are clarifying that the maximum allowable power levels in the 700 MHz Commercial Services Band are to be defined on a "per megahertz of spectrum bandwidth" basis, rather than on a "per emission" basis. This clarification will enable higher power signals from wider band technologies, but will not result in a decrease in the total power currently allowed in the band from narrower band technologies.")

## **II. CONCLUSION**

The adoption of rules based on the principles advocated by WCA herein will yield the results desired by the Commission — prompt rollout of both public safety and commercial services, with opportunities for participation by all types of public safety and commercial providers, with the marketplace determining which services should be offered.

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