

**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
)	
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
)	

**REPLY COMMENTS OF THE
NATIONAL TELECOMMUNICATIONS COOPERATIVE ASSOCIATION**

The National Telecommunications Cooperative Association (“NTCA”)¹ hereby submits these reply comments in response to the Federal Communications Commission’s

¹ NTCA is the premier industry association representing rural telecommunications providers. Established in 1954 by eight rural telephone companies, today NTCA represents 575 rural rate-of-return regulated incumbent local exchange carriers (ILECs). All of its members are full service local exchange carriers, and many members provide wireless, cable, Internet, satellite and long distance services to their communities. Each member is a “rural telephone company” as defined in the Communications Act of 1934, as amended (Act). NTCA members are dedicated to providing competitive modern telecommunications services and ensuring the economic future of their rural communities.

(Commission's) Notice of Proposed Rulemaking (Notice) and the accompanying initial regulatory flexibility analysis in the above referenced proceeding.²

As NTCA has pointed out numerous times in the 700 MHz proceedings, NTCA's members are very much interested in the 700 MHz spectrum auction. Rural carriers believe it to be an opportunity to obtain a spectrum resource that will enable them to bring advanced broadband service to their rural subscribers. The 700 MHz spectrum is uniquely situated with propagation characteristics that will enable licensees to cover great distances with minimal tower construction. Putting aside the cost of spectrum acquisition, the largest financial obstacle to wireless broadband deployment is the cost associated with tower construction. Unlike urban areas where the revenues generated from a large number of customers offset the cost of tower construction and additional towers are constructed when customer demand exceeds capacity, rural carriers must cover great distances with fewer customers over which to spread construction costs. Consequently, the cost-benefit analyses of serving urban and rural areas are not comparable. Urban carriers construct to handle consumer volume; rural carriers construct to handle consumer distance.

The propagation characteristics of the 700 MHz spectrum are such that few towers are needed to cover great distances. Fewer towers translate to decreased build out costs in

² *Service Rules for the 698-746, 747-762 and 777-792 MHz Bands; Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Section 68.4(a) of the Commission's Rules Governing Hearing Aid Compatible Telephones; Biennial Regulatory Review- Amendment of Parts 1, 22, 24, 27 and 90 to Streamline and Harmonize Various Rules Affecting Wireless Radio Services; Former Nextel Communications, Inc. Upper 700 MHz Guard Band Licenses and Revisions to Part 27 of the Commission's Rules; Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band; Development of Operational, Technical and Spectrum Requirements for Meeting Federal, State and Local Public Safety Communications Requirements Through the Year 2010, Report and Order and Further Notice of Proposed Rulemaking, WT Docket No. 06-150, CC Docket No. 94-102, WT Docket No. 01-309, WT Docket No. 03-264, WT Docket No. 06-169, PS Docket No. 06-229, and WT Docket No. 96-86, rel. April 27, 2007*

rural areas. It is essential that the Commission craft rules that provide small carriers with the desire to serve rural areas the opportunity to obtain 700 MHz spectrum.

I. NUMEROUS PARTIES SUPPORT THE COMMISSION'S PROPOSAL TO LICENSE THE B BLOCK ACCORDING TO CMAS

NTCA supports the Commission's proposed reconfiguration of the Lower 700 MHz Band. The plan offers one block of spectrum each according to CMAs, EAs and REAGs. The B block (704-710 MHz and 734-740 MHz) is proposed to be auctioned according to CMAs. NTCA very much supports this idea, as do numerous other parties.³ In fact, there is no opposition to the B block being auctioned according to CMAs.

The availability of 734 licenses in this block will afford small and rural carriers reasonable opportunities to acquire 700 MHz spectrum. As other commenters noted, licensing the Lower 700 MHz B block according to CMAs may also permit existing Lower 700 MHz C-block licensees the flexibility of augmenting their spectrum with adjacent bandwidth for a combined 24 MHz block of spectrum.⁴ Current C-block licensees will need additional bandwidth in rural areas to meet future consumer broadband demands and accommodate new technologies.

The record supports auctioning the Lower 700 MHz B block according to CMAs and the Commission should adopt this proposal.

³ See, e.g., Comments of Cellular South Licenses Inc., 700 MHz Independents, Leap Wireless, Metro Communications PCS, Rural Telecommunications Group, Rural Cellular Association, Frontier Communications, Leap Wireless International, Inc., Union Telephone Company, United States Cellular Corporation, Wireless Internet Service Provider Association.

⁴ See Comments of Cellular South Licenses Inc, Rural Telecommunications Group, Wireless Internet Service Provider Association.

II. THE RECORD SUPPORTS PROPOSAL #2 FOR THE UPPER 700 MHz BAND

Although the Commission seeks comment on a number of alternative proposals for the Upper 700 MHz Commercial Service band, only Proposal #2 will benefit consumers living in rural communities. A number of commenters support this proposal.⁵

Proposal 2 would have the Commission license 34 MHz of spectrum in the Upper 700 MHz band using a mix of geographic licensing areas. It creates two 11- MHz licenses, one each in the C and D blocks, and a 12 MHz E block license. The Commission proposes to license the D block on an EA basis and the E block on an REAG basis, while licensing the C block according to smaller areas, either CMAs or EAs.

NTCA and others request that the Commission adopt Proposal 2 with the C block licensing on a CMA basis.⁶ A combination of small and large license blocks affords the most opportunity to the largest number of potential licensees to obtain spectrum. Small carriers would have an opportunity to compete for CMAs and larger carriers could compete for EAs and REAGs. Large carriers would also have the opportunity to supplement their upper 700 MHz

⁵ See, Comments of Cellular South Licenses Inc, Centennial Communications Corp., 700 MHz Independents, Leap Wireless, Metro Communications PCS, Rural Telecommunications Group, SpectrumCo, Blooston Rural Carriers, Alltel, Aloha Partners, LP, Frontier Communications, Union Telephone Company, Wireless Internet Service Provider Association.

⁶ Comments of 700 MHz Independents, Rural Telecommunications Group, Blooston Rural Carriers, Frontier Communications, Union Telephone Company, Wireless Internet Service Provider Association.

spectrum with CMAs where spectrum of the REAG or EA is not sufficient, or aggregate CMAs as needed.

A band plan that does not include CMA-sized licenses will benefit only the largest carriers. Rural carriers cannot compete for the spectrum and history has shown they will have little luck in convincing large carriers to partition their spectrum. Large carriers are better able to consolidate spectrum than smaller carriers are able to convince large carriers to part with spectrum in the form of partitioning or disaggregation.

III. THE COMMISSION SHOULD NOT RESTRICT THE ABILITY OF WIRELINE BROADBAND PROVIDERS TO OBTAIN 700 MHz SPECTRUM

A number of commenters oppose the imposition of a restriction on the eligibility of incumbent LECs, incumbent cable operators or large wireless carriers to participate in the auction.⁷ There is little support for such a proposal and it would be a mistake for the Commission to adopt it. All of NTCA's members are rural incumbent LECs who would be prevented from bidding on 700 MHz licenses. Precluding them from participating in the auction or forcing eligibility restrictions such as a limitation of eligibility to structurally separate affiliates would undermine the Commission's stated goal in this proceeding. The Commission states that it wants to get spectrum into the hands of small and rural carriers and other new entrants. NTCA's members are the very carriers the Commission should be helping. Rural wireline carriers are interested in bringing advanced broadband services to rural areas and the public interest is served by permitting them full participation in the 700 MHz auction.

IV. THE COMMISSION SHOULD NOT ADOPT BLIND BIDDING OR COMBINATORIAL BIDDING FOR THE 700 MHz AUCTION

⁷ See Comments of AT&T, CTIA – The Wireless Association, Frontier Communications, NCTA, Union Telephone Company, Verizon Wireless.

NTCA agrees with commenters that the Commission should not adopt blind bidding or combinatorial bidding for the 700 MHz auction.⁸ Both blind bidding and combinatorial bidding disadvantage small businesses and rural carriers.

Blind bidding procedures make it impossible for small and rural companies to make rational bidding decisions in an auction. Rural carriers need to know the identities of their neighbors when making bidding decisions in order to formulate a spectrum acquisition plan. They depend on neighboring licensees for roaming agreements and have enough history with many of the anticipated auction participants to know whether agreements may be reached. Furthermore, small carriers will have greater confidence in the 700 MHz auction results and will bid with more certainty, if they know who they are bidding against and the total eligibility of their opponents.

Similarly, combinatorial bidding should not be available for the smaller geographical areas that will be licensed in the upcoming 700 MHz auction. Combinatorial bidding would make bidding for small and rural carriers too complicated. They lack the resources to hire economists and experts to guide them in the decisions as they consider 734 CMA-sized licenses.

As was shown in the AWS auction, a large carrier does not need combinatorial bidding to aggregate a large footprint. There is a large amount of commercial spectrum for auction, and different blocks from which a carrier could choose to create a footprint. Combinatorial bidding would unnecessarily complicate the auction and make it more difficult for small and rural carriers to succeed in obtaining spectrum.

⁸ Comments of Aloha Partners, LP, Cellular South Licenses, Inc, Dobson Communication Commission, Leap Wireless, MetroPCS Communications Inc., Rural Cellular Association, United States Cellular Corporation.

V. CONCLUSION

NTCA's rural telephone company membership is very much interested in the auction of the remaining 700 MHz spectrum, believing it to be a unique opportunity to obtain spectrum that is particularly well suited for their needs. The record supports licensing spectrum in both the lower and upper bands according to CMAs, giving small carriers a realistic opportunity to obtain licenses. To further the Commission's goal of providing opportunities for a variety of licensees, including small and rural providers, it should reject proposals to limit opportunities for incumbent carriers. The Commission should also reject blind bidding and combinatorial bidding for the 700 MHz auction.

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June 4, 2007

CERTIFICATE OF SERVICE

I, Adrienne Rolls, certify that a copy of the foregoing Reply Comments of the National Telecommunications Cooperative Association in WT Docket No. 06-150, WT 06-169, PS 06-229, WT 96-86, FCC 07-72, was served on this 30th day of May 2007 by first-class, United States mail, postage prepaid, or via electronic mail to the following persons:

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