

**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
	)	
Declaratory Ruling on Reporting Requirement under Commission’s Part 1 Anti- Collusion Rule	)	WT Docket No. 07-166
	)	
Implementation of the Commercial Spectrum Enhancement Act and Modernization of the Commission’s Competitive Bidding Rules	)	WT Docket No. 05-211

To: The Commission

**AMENDMENT OF FRONTLINE WIRELESS, LLC  
TO ITS PETITION FOR RECONSIDERATION**

December 4, 2007

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Fostering competition and facilitating the ability of new entrants to participate in the 700 MHz auction have been of primary concern to Frontline throughout this proceeding. The Commission's recent *Order* amending the designated entity ("DE") rules for the upcoming 700 MHz D Block Auction goes a long way to help accomplish both of these goals.<sup>1</sup>

In the reconsideration stage of this proceeding, in addition to advocating for clarification or other relief under the DE rules, Frontline has also asked the Commission to lower its reserve prices in order to advance these same goals of increasing competition and adopting rules which allow small businesses an opportunity to successfully participate in the auction.

In light of the Commission's *Order* Frontline no longer advocates altering the reserve prices for the 700 MHz auction. As Frontline noted in its Reply to Oppositions to Petitions for Reconsideration,<sup>2</sup> allowing a DE credit for an otherwise eligible wholesaling small business significantly increases the likelihood that the reserve price will be met. Further, the DE credit facilitates bidding by small businesses and new entrants and helps to increase competition, thereby meeting the main concerns associated with a high reserve price.

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Frontline also notes the recent support expressed by the public safety community for the view that the Commission's initial definition of "sufficient signal coverage," is far too

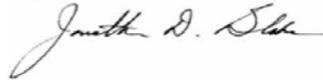
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<sup>1</sup> In the Matter of Waiver of Section 1.2110(b)(iv)(A) of the Commission's Rules For the Upper 700 MHz Band D Block License, *Order* (Nov. 15, 2007).

<sup>2</sup> See Reply of Frontline Wireless, LLC to Oppositions to Petitions for Reconsideration, *Service Rules for the 698-746, 747-762, and 777-792 Bands et al.*, WT Docket No. 06-150, *et al.*, (Oct. 29, 2007) at 8, note 21 ("If the Commission were to allow bidding credits for entities offering complete wholesale service and who are otherwise eligible, the reserve prices would likely be met, and Frontline would not pursue the objections stated in Section V in this Reply").

aggressive.<sup>3</sup> As Frontline noted in its Opposition to Petitions for Reconsideration, while the shared network should provide “[s]ufficient signal coverage to ensure reliable operation throughout the service area consistent with typical public safety communications systems,” the Commission should delete the parenthetical reference which reads “(i.e., 99.7 percent or better reliability),” because there is no support in the record for such a number.<sup>4</sup> In the recently released Public Safety Broadband Statement of Requirements, the public safety community has suggested 95% signal coverage. As all parties who commented on this issue agree that 99.7% is not the correct figure, on reconsideration the Commission should remove the reference to such a number in the *Order*.

Respectfully submitted,



December 4, 2007

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<sup>3</sup> See *Public Safety 700 MHz Broadband Statement of Requirements, Version 0.6*, released November 8, 2007 at Section 5.1.3, p. 38.

<sup>4</sup> See *Opposition of Frontline Wireless, LLC to Petitions for Reconsideration, Service Rules for the 698-746, 747-762, and 777-792 Bands et al.*, WT Docket No. 06-150, *et al.*, (Oct. 17, 2007) (citing the Commission’s Second Report & Order, *In the Matter of Service Rules for the 698-746, 747-762 and 777-792 MHz Bands, et al.*, WT Docket No. 06-150 *et al.*, (July 31, 2006) at ¶ 405). This request for relief does *not* address the 99.3% buildout requirement.