

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

In the Matter of)
)
Service Rules for Advanced Wireless Services) WT Docket No. 07-195
in the 2155-2175 MHz Band)

REPLY COMMENTS OF NEW ICO SATELLITE SERVICES G.P.

New ICO Satellite Services G.P. (“ICO”) submits these reply comments in response to the Notice of Proposed Rulemaking (“NPRM”)¹ in the above-referenced proceeding, which seeks comment on service rules for licensed fixed and mobile services, including Advanced Wireless Services (“AWS”), in the 2155-2175 MHz band (“AWS-3”). As discussed in detail in its comments, ICO supports the Commission’s efforts to allow for the most effective and efficient use of the spectrum in this band.² ICO supports flexible service rules to promote innovation and deployment of new advanced services.

In its comments, ICO requested that the Commission permit the broadest opportunities for use of the AWS-3 spectrum, without burdening adjacent (or co-channel) spectrum users with excessive interference mitigation requirements. ICO supported uplink and downlink communications in the AWS-3 band. Some commenters, such as the Sprint Nextel Corporation, the Wireless Communications Association International, Inc., and ArrayComm LLC, also

¹ See *Service Rules for Advanced Wireless Services in the 2155-2175 MHz Band*, Notice of Proposed Rulemaking, 22 FCC Rcd 17035 (2007) (“NPRM”).

² See Comments of New ICO Satellite Services G.P., WT Docket No. 07-195 (filed Dec. 14, 2007) (“ICO Comments”).

expressed support for an uplink/downlink approach to the band.³ Others, such as Verizon Wireless, T-Mobile USA, Inc., and TerreStar Networks, Inc., opposed an uplink/downlink approach, specifically citing concerns about mobile-to-mobile interference.⁴

Although the commenters are at odds, ICO remains hopeful that a solution can be achieved that would provide maximum flexibility for usage of the band, without causing harmful interference to adjacent band licensees. The Commission has provided flexibility for innovative services in other contexts, such as the Broadband Radio Service/Educational Broadband Service and the 700 MHz Commercial service rules. These service rules should provide guidance to the Commission and interested parties in this rulemaking. ICO is interested, especially as an adjacent channel operator, in the resolution of this proceeding. Therefore, ICO will remain engaged in this proceeding, will continue to review the record as it develops, and will be available for further discussions.

Respectfully submitted,

NEW ICO SATELLITE SERVICES G.P.

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³ See generally Comments of Sprint Nextel Corporation, WT Docket No. 07-195 (filed Dec. 14, 2007); Comments of Wireless Communications Association International, WT Docket No. 07-195 (filed Dec. 14, 2007); Comments of ArrayComm LLC, WT Docket No. 07-195 (filed Dec. 14, 2007).

⁴ See generally Comments of Verizon Wireless, WT Docket No. 07-195 (filed Dec. 14, 2007); Comments of T-Mobile USA, Inc., WT Docket No. 07-195 (filed Dec. 14, 2007); Comments of TerreStar Networks Inc., WT Docket No. 07-195 (filed Dec. 14, 2007).