

# **CTIA PETITION FOR RULEMAKING TO TRANSITION CELLULAR LICENSES TO MARKET-BASED LICENSING**

Presentation to  
Paul Murray  
Office of Acting Chairman Michael Copps

CTIA – The Wireless Association®

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# Background

- Cellular licensees were originally licensed based on their Cellular Geographic Service Area (“CGSA”) as defined by the analog service contour of its cell sites.
- In 1992, the Commission changed the definition of CGSA to a lower power contour and began permitting non-licensees to file applications to provide service in unserved areas.
- In February 2008, the Commission’s analog sunset allowed carriers to “maintain” their CGSA coverage area using digital technologies despite differences in the actual coverage using digital.

# CTIA's Petition

- CTIA's Petition asks the Commission to reissue licenses in the cellular band on a CMA basis.
- The new cellular license would cover the entire CMA except:
  - Where another licensee operates in the CMA under an unserved area license; and,
  - Where the cellular licensees digital coverage area extends beyond the boundaries of its newly-issued CMA license.
- In either case, the two licensees are given an opportunity to consult with each other to determine service area boundaries.
- In the unlikely event that the two licensees cannot reach agreement, they may refer the matter to the Commission for adjudication.

# CTIA's Petition

- The current system is inefficient and bears no real-world relationship to carriers digital coverage areas and technologies.
  - Current FCC rules require collection of site and radial information that is unrelated to the digital services being offered.
  - Adoption of CTIA's Petition will provide technological parity and neutrality across CMRS bands.
  - Elimination of the site-based rules will reduce administrative burden on carriers and allow carriers the flexibility to rapidly respond to consumer demand for more and better services within their service territory.
  
- There is substantial precedent for transitioning site-based services to market-based licensing:
  - 900 MHz SMR
  - 800 MHz SMR
  - Paging Service
  - 220 MHz Service
  - MDS
  - 39 GHz Service