



22 June 2011

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Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Spectrum Task Force Requests Information on Frequency Bands Identified by NTIA as Potential Broadband Spectrum, ET Docket No. 10-123*

Dear Ms. Dortch:

On June 21, 2011, Chris Pearson, President of 4G Americas, LLC (“4G Americas”) and Patricia Paoletta, Wiltshire & Grannis LLP and counsel to 4G Americas visited with Marius Schwartz, Chief Economist, to review the attached power point, which includes points raised in ET Docket No. 10-123 including assessment of the 1755-1850 MHz band for wireless broadband. 4G Americas unites mobile operators, vendors, and manufacturers in the Americas to provide a single voice representing the Third Generation Partnership Project (“3GPP”) family of wireless technologies. The mission of 4G Americas is to promote, facilitate, and advocate for the deployment of the 3GPP family of mobile broadband technologies throughout the ecosystem in the Americas, including networks, services, applications, and wirelessly connected devices.

As 4G Americas noted in its comments in ET Docket 10-123¹, internationally harmonized spectrum is more likely to result in equipment that has benefitted from global economies of scale and scope, as well as innovation. Internationally harmonized spectrum is therefore likely to result in higher bid amounts in any subsequent auction. The 1755-1780 MHz band—unlike the 1695-1710 MHz band—is regionally and internationally harmonized spectrum for mobile broadband. In general, the 1.7/2.1 GHz band, the 3GPP Band 10, is harmonized in our hemisphere for mobile broadband technologies including HSPA, HSPA+ and LTE. Duplex spacing in the 1755-1780 MHz band is similar to that in AWS-3, so lower costs can be expected for the development of compatible devices. Therefore, commercial mobile broadband allocations in the 1755-1780 MHz band (uplink), especially when paired with 2155-2180 MHz (downlink), will capitalize on the economies of scale in infrastructure and devices so as to be able to serve society efficiently. The Americas and providers in other regions have identified the 1.7/2.1 GHz Band 10 as ideal for mobile broadband. With a critical mass of global vendors and operators developing network equipment and devices to operate in Band 10, equipment will be readily available in this important band.

¹ Comments of 4G Americas at 2-4, ET Docket No. 10-123 (filed April 22, 2011).

Conversely, fragmented spectrum allocations make it more difficult for vendors to export equipment, technologies, and services developed for that fragment to other markets. U.S. providers for that fragment would not benefit from developments in international markets. Fragmented spectrum allocations hamper innovation and require companies to dedicate resources for a single market, rather than sharing those development costs globally. Fragmented allocations for the U.S. market raise the cost of devices for the U.S. consumer and limit the availability of products and services in the U.S. market. Moreover, specialized technology takes time to commercialize, so not only would U.S. consumers using fragmented spectrum have higher cost, more limited devices and services, but those devices and services would take longer to come to market mobile broadband services and provides a guide for securing a bright mobile broadband future to serve society's wireless and technology needs. For these reasons, fragmented spectrum is also likely to result in lower auction bids than internationally harmonized spectrum.

Sincerely,



Patricia Paoletti

cc: Marcus Schwartz

Attachments: PowerPoint Presentation, Chris Pearson, 4G America's President, *3GPP Mobile Broadband in a Connected World* (June 2011).

Chris Pearson Letter to Assistant Secretary Strickling (May 25, 2010).