

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Amendment of Parts 1, 21, 73, 74 and 101 of the)	WT Docket No. 03-66
Commission's Rules to Facilitate the Provision of)	RM-11614
Fixed and Mobile Broadband Access, Educational)	
and Other Advanced Services in the 2150-2162)	
and 2500-2690 MHz Bands)	

Comments of Huawei Technologies (USA)

Huawei Technologies (USA) ("Huawei"), in response to the Fourth Further Notice of Proposed Rulemaking ("FNPRM") adopted and released by the Federal Communications Commission ("FCC" or "Commission") on May 24, 2011, in the above-referenced matter,¹ hereby submits comments in support of the proposed changes to Section 27.53(m) of the Commission's rules as proposed by the Wireless Communications Association International ("WCAI").

I. Discussion

Huawei is a leading global provider of next-generation telecommunications network solutions and devices, serving customers in more than 140 countries with a comprehensive set of advanced products and solutions that span wireline, wireless and IP technologies. Our products and solutions have been deployed by 45 of the world's top 50 telecom operators, supporting the communications needs of one-third of the world's population. Among our capabilities, we provide wireless providers with devices to support 4G mobile broadband service deployments in the 2.5GHz band nationwide.

¹*In the Matter of Wireless Communications Association Int'l Petition to Amend Section 27.53(m) of the Commission's Rules*, Public Notice, RM-11614 (rel. Nov. 4, 2010).

In its October 22, 2010, Petition for Rulemaking, WCAI asked that the Commission amend its rules governing out-of-band-emission (OOBE) limits for mobile digital stations in the 2.5 GHz band to accommodate the use of the wider channel bandwidths. Specifically, WCAI asked that the Commission relax slightly the OOBE limits for mobile digital stations in section 27.53(m)(4) from $43 + 10 \log (P)$ dB to $40 + 10 \log (P)$ dB at the channel edges, and impose a $43 + 10 \log (P)$ dB attenuation factor beyond 5MHz from the channel edges, and a $55 + 10 \log (P)$ dB attenuation factor at “X” MHz from the channel edges where “X” is the greater of 6 MHz and the actual channel bandwidth. WCAI also requested that the Commission allow a resolution bandwidth of two percent for mobile digital stations in section 27.53(m)(6). In its FNPRM, the Commission specifically seeks comment on whether it should modify the out-of-band emission limits as requested by WCAI.²

Huawei supports the proposed rule change and agrees with WCIA that amending the OOBE limits in the 2.5 GHz band as requested is necessary to realize the full benefits of 4G technologies and better align the Commission’s rules with the approach of the global 3rd Generation Partnership Project³ (3GPP) and future WiMAX standards applicable to the 2.5 GHz band.⁴ Providing for operation of wider channel bandwidths will promote efficient use of the spectrum and help achieve the goals of the FCC’s National Broadband Plan for mobile broadband. Harmonizing the Commission’s rules with the applicable 3GPP standard and future WiMAX standards will enable manufacturers and network operators to realize significant economies of scale in 2.5 GHz mobile devices, which would otherwise need to be customized for use in the United States.

² FNPRM at §§ 11-13.

³ The 3rd Generation Partnership Project (3GPP) is a consensus-driven international partnership of telecommunications standards bodies.

⁴ See 3GPP TS 36.101 V8.7.0 (2009-09).

In addition, Huawei agrees with WCAI that the proposed changes are necessary to:

- allow operators to provide the full uplink capacity available in 20 MHz or wider channels, which would greatly enhance spectrum efficiency and broadband throughput; and
- achieve a reasonable balance between smartphone design issues (e.g., size and battery life) and spectrally efficiency wider channel bandwidths, and thus fulfill the promise of 4G technologies.

As the Commission notes, the proposed rule is not limited to 20 MHz channels and international standards bodies are contemplating the use of wider channels.⁵ The Commission asks whether the proposed rule is suitable for channels wider than 20 MHz. Because the proposed rule scales linearly across any bandwidth, it can accommodate future carrier-aggregation features under consideration internationally for devices operating pursuant to channelization plans of greater than 20 MHz. The Commission should, therefore, adopt the proposed OOB rule and not limit it to 20 MHz channels.

The Commission also asks whether, in connection with the proposed rule changes, it should consider adopting additional measures of protecting against interference to adjacent bands by, for example, establishing stricter OOB limits at the band edges of the 2.5 GHz allocation.⁶ Huawei opposes this proposal because it would undo many of the benefits stemming from the OOB change. For example, it would establish an OOB framework that would be unique to the United States and deviate from international standards. This would eliminate one of the primary benefits of the change, which is to enable manufacturers and network operators to realize enormous economies of scale in 2.5 GHz mobile devices, which would otherwise need to be customized for use in the United

⁵ FNPRM at §17.

⁶ FNPRM at §16.

States. As WCAI has explained, the likelihood of heightened adjacent band interference is remote, and processes are already in place to handle any adjacent band interference issues. Huawei therefore urges the Commission to implement the changes to the OOB limits as proposed by WCAI and without additional or different limits at the 2.5 GHz band edges.

II. Conclusion

Huawei Technologies (USA) supports adoption of the modifications to the OOB rule proposed by WCAI and agrees with WCAI that the proposed changes are necessary to facilitate the rapid deployment of 4G mobile broadband services in the 2.5 GHz band nationwide.

Respectfully submitted,

Huawei Technologies (USA)

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