

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Spectrum Task Force Invites Technical)	ET Docket No. 10-142
Input on Approaches to Maximize)	WT Docket No. 04-356
Broadband Use of Fixed/Mobile Spectrum)	WT Docket No. 07-195
Allocations in the 2 GHz Range)	

REPLY COMMENTS OF T-MOBILE USA, INC.

T-Mobile USA, Inc. (“T-Mobile”) respectfully submits these reply comments in the Commission’s proceeding inviting input on approaches to encourage the growth of terrestrial broadband services in the 2 GHz Mobile Satellite Service (“MSS”) spectrum that is allocated for fixed and mobile use.^{1/} The record shows broad support for the Commission’s efforts to make the 2 GHz MSS spectrum available for terrestrial mobile broadband services. But, as T-Mobile and other commenters in this proceeding noted, the Commission should not adopt any definitive band plan at this time for the use of terrestrial broadband services in the 2 GHz MSS band. Adopting a band plan now could prejudice the potential use of the 1755-1780 MHz band, which should be ideally paired with the AWS-2 upper J block spectrum at 2175-2180 MHz and the AWS-3 spectrum at 2155-2175 MHz. Parties agreed with T-Mobile that rather than adopting any of the band plans contained in the *Public Notice* in this proceeding, the Commission should wait to determine if the 1755-1850 MHz band becomes available for wireless broadband so that it may be included in the Commission’s terrestrial broadband spectrum planning.

^{1/} *Spectrum Task Force Invites Technical Input on Approaches to Maximize Broadband Use of Fixed/Mobile Spectrum Allocations in the 2 GHz Range*, Public Notice, ET Docket No. 10-142, DA 11-929 (rel. May 20, 2011) (“*Public Notice*”). The Commission extended the deadlines for the submission of comments and reply comments in this proceeding to July 8 and July 22, respectively. *See Spectrum Task Force Extends Period for Filing Comments and Reply Comments for Technical Input on Approaches to Maximize Broadband Use of Fixed/Mobile Spectrum Allocations in the 2 GHz Range*, Public Notice, ET Docket No. 10-142, DA 11-1046 (rel. June 10, 2011).

T-Mobile's comments supported the Commission's efforts to make the 2 GHz MSS spectrum suitable for terrestrial mobile broadband services.^{2/} However, T-Mobile noted that it is premature for the Commission to adopt a band plan for that spectrum, particularly if that band plan also involves the use of AWS-2 upper J Block and AWS-3 spectrum.^{3/} Instead, T-Mobile urged the Commission to work with the National Telecommunications and Information Administration ("NTIA") to make the 1755-1850 MHz band available for wireless broadband use in the future.^{4/} It pointed out that if this spectrum is made available, the Commission would be able to use part of that band – 1755-1780 MHz – to pair with AWS-2 upper J Block and AWS-3 spectrum.^{5/} Moreover, if the entire 1755-1850 MHz band were made available, T-Mobile pointed out that the Commission may wish to consider that spectrum in the band plan for the 2 GHz spectrum as part of a more strategic approach that will optimize the use of spectrum for mobile broadband.^{6/}

Like T-Mobile, other commenters in this proceeding expressed support for making the 2 GHz MSS spectrum more accessible for terrestrial wireless broadband operations.^{7/} However, also like T-Mobile, other commenters urged the Commission not to adopt any plan that would

^{2/} Comments of T-Mobile, ET Docket No. 10-142 at 1 (filed July 8, 2011) ("Comments of T-Mobile").

^{3/} Comments of T-Mobile at 6.

^{4/} Comments of T-Mobile at 5.

^{5/} Comments of T-Mobile at 5-7.

^{6/} Comments of T-Mobile at 11.

^{7/} *See, e.g.*, Comments of AT&T, ET Docket No. 10-142 at 1 (filed July 8, 2011) ("Comments of AT&T"); Comments of Consumer Electronics Association, ET Docket No. 10-142 at 2 (filed July 8, 2011) ("Comments of CEA"); Comments of CTIA, ET Docket No. 10-142 at 1 (filed July 8, 2011) ("Comments of CTIA"); Comments of Sprint-Nextel, ET Docket No. 10-142 at 12 (filed July 8, 2011) ("Comments of Sprint-Nextel"); Comments of Telecommunications Industry Association, ET Docket No. 10-142 at 2 (filed July 8, 2011) ("Comments of TIA"); Comments of TerreStar Networks Inc., ET Docket No. 10-142 at 3 (filed July 8, 2011) ("Comments of TerreStar"); Comments of Verizon Wireless, ET Docket No. 10-142 at 1 (filed July 8, 2011) ("Comments of Verizon").

affect the optimum pairing of the 1755-1780 MHz band with the AWS-2 upper J Block and the AWS-3 band at this time.^{8/} AT&T noted that the Commission should “continue to work with NTIA to repurpose the 1755-1780 MHz band and pair it with the AWS-3 band at 2155-2175 MHz and the upper portion of the AWS-2 J block at 2175-2180 MHz,”^{9/} and CTIA likewise asserted that the Commission “can best facilitate mobile broadband operations in the AWS-3 spectrum by pairing the 2155-2180 MHz band with federal spectrum at 1755-1780 MHz.”^{10/} Ericsson expressed its strong support for “combining the AWS-2 upper J Block with AWS-3 and pairing that enlarged AWS-3 block with the 1755-1780 MHz spectrum that NTIA is considering making available.”^{11/} Sprint-Nextel similarly stated that the Commission should “collaborate with NTIA [] before moving forward with a specific 2 GHz band plan proposal (potentially enabling the pairing of the 1755-1780 MHz government band with the 2155-2180 MHz band currently identified for AWS-3 and AWS J Block use).”^{12/} Finally, the Telecommunications Industry Association noted that “the Commission should make pairing 1755-1780 MHz with the AWS-3 block a priority,”^{13/} and Verizon noted the “broad industry support for reallocation of the 1755-1780 MHz band and the pairing of that spectrum with the currently unassigned 2155-2180 MHz band.”^{14/}

Other commenters also broadly recommended that the Commission wait to consider a band plan for the 2 GHz MSS spectrum to determine if the entire 1755-1850 MHz band would

^{8/} Comments of AT&T at 5; Comments of CTIA at 8; Comments of Ericsson at 7; Comments of Sprint-Nextel at 10; Comments of TIA at 4; Comments of Verizon at 3.

^{9/} Comments of AT&T at 5.

^{10/} Comments of CTIA at 8.

^{11/} Comments of Ericsson at 7.

^{12/} Comments of Sprint-Nextel at 10.

^{13/} Comments of TIA at 4.

^{14/} Comments of Verizon at 3.

be made available for wireless broadband use, recognizing that if the entire band becomes available, the Commission may wish to consider other potential band plans.^{15/} Verizon, for instance, urged the Commission “not to take any action on the 2155-2180 MHz band until a final decision has been made on reallocation of spectrum above 1755 MHz,” and then to “revisit the potential band plans outlined in the Public Notice as well as consider other proposals” after NTIA has completed its review of the 1755-1850 MHz band.^{16/} AT&T similarly urged the Commission to “engage in a holistic and comprehensive approach to band-planning in which the 2 GHz MSS frequencies would be addressed as part of a larger, coordinated band plan developed to make most efficient use of spectrum for terrestrial mobile services.”^{17/}

Like T-Mobile, other commenters noted that band plans contained in the *Public Notice*, which create a mobile uplink immediately adjacent to the personal communications service (“PCS”) base station downlink band, create a significant potential for interference.^{18/} AT&T, for instance, noted that the Commission’s “proposed concepts create a risk of interference.”^{19/} TIA explained that a “lack of separation between the uplink and downlink frequency bands can pose significant interference issues, and the potential for harmful interference to the services in these bands would also create considerable uncertainty in the marketplace.”^{20/} CTIA also noted the “significant potential for harmful interference,”^{21/} and Sprint-Nextel similarly noted the

^{15/} See, e.g., Comments of AT&T at 2; Comments of CTIA at 11-13; Comments of Ericsson at 7; Comments of Sprint-Nextel at 10; Comments of TIA at 4; Comments of Verizon at 1.

^{16/} Comments of Verizon at 4.

^{17/} Comments of AT&T at 4.

^{18/} See, e.g., Comments of T-Mobile at 6-7; Comments of AT&T at 5; Comments of CTIA at 12; Comments of Sprint-Nextel at 3-4; Comments of TIA at 5; Comments of TerreStar at 4-5; Comments of Verizon at 6.

^{19/} Comments of AT&T at 5.

^{20/} Comments of TIA at 5.

^{21/} Comments of CTIA at 12.

“potential for interference” under proposals in the *Public Notice*.^{22/} Finally, TerreStar Networks noted that the “juxtaposition of uplink and downlink bands in adjacent spectrum creates unique interference issues,” and that the Commission should take these interference issues into account when considering potential 2 GHz band plans.^{23/}

^{22/} Comments of Sprint-Nextel at 3-4.

^{23/} Comments of TerreStar at 4-5.

CONCLUSION

T-Mobile supports the Commission's efforts to make the 2 GHz MSS spectrum suitable for terrestrial mobile broadband services. However, as comments in this proceeding confirm, it is premature for the Commission to adopt a band plan for that spectrum, particularly if a potential band plan also involves the use of AWS-2 upper J block spectrum at 2175-2180 MHz and the AWS-3 spectrum at 2155-2175 MHz. Commenters agree that the Commission should work with NTIA to make the 1755-1850 MHz band available for commercial wireless broadband use in the future, noting that if this spectrum is made available, the Commission would wish to consider it in the band plan for the 2 GHz spectrum, as part of a more strategic approach that will optimize the use of spectrum for mobile broadband.

Respectfully submitted,

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