



4G Americas
1750 112th Ave NE, B220
Bellevue, WA 98004
O: 425 372 8922
www.4gamericas.org

August 10, 2011

BY ELECTRONIC COMMENT FILING SYSTEM (“ECFS”)

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:

4G Americas, relative to the above-referenced proceeding, notes that the 3550-3650 MHz band is not a leading band for licensed mobile broadband use in the U.S. 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, such as HSPA, HSPA+, LTE, and LTE Advanced. The mission of 4G Americas is to promote, facilitate, and advocate for the deployment of the 3GPP family of mobile broadband technologies throughout the Americas, including networks, services, applications, and wirelessly connected devices.

In its Public Notice earlier this year, the Federal Communications Commission (“Commission”) sought comment on the steps it could take to best promote wireless broadband deployment in the 3550-3560 MHz band, given that the band was identified by the National Telecommunications and Information Administration (“NTIA”) as a candidate band for accommodating wireless broadband.¹ The Commission’s Notice referenced the National Broadband Plan’s recommendation to make 500 MHz newly available for broadband use. The Plan provides that “500 MHz should be made newly available for mobile, fixed and unlicensed broadband use over the next 10 years” “for a variety of licensed and unlicensed flexible

¹ *Spectrum Task Force Requests Information on Frequency Bands Identified by NTIA as Potential Broadband Spectrum*, Public Notice, 26 FCC Rcd. 3486 (2011).

commercial uses”, as well as non-commercial uses.² The Plan recommends that 300 MHz should be made available for mobile flexible use within five years.

4G Americas does not believe that licensed mobile use of the 3550-3650 MHz band is a good candidate for helping to meet the National Broadband Plan’s goals. 4G Americas strongly agrees with the numerous commenters in this docket who note the unsuitability of this band due to its extensive exclusion zones, which NTIA has determined would exclude approximately 60 percent of the U.S. population.³ Spectrum is most valuable, best utilized, and most efficiently deployed if cleared of incumbents on a nationwide basis.

By contrast, 4G Americas reiterates its support for repurposing 1755-1780 MHz as a priority band for commercial mobile broadband in the immediate term. As 4G Americas has noted before in this docket, commercial mobile broadband 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, as well as optimize deficit reduction results.⁴ Such a pairing is within the international standards body 3GPP plan. Additionally, countries throughout North, Central, and South America are actively considering this band pairing for mobile broadband.

Consistent with several legislative proposals, 4G Americas supports pairing at auction the 1755-1780 MHz and 2155-2180 MHz bands in the near-term and then licensing the use of that paired spectrum to the highest bidder. 4G Americas notes that the National Broadband Plan proposed holding auctions for both AWS-2 and AWS-3 this year, in 2011.⁵ Furthermore, 4G Americas is hopeful that the Commission is provided the authority to move forward with voluntary incentive auctions of underutilized and unutilized broadcast spectrum, since such spectrum provides much greater promise of serving our country’s mobile broadband needs than the 3550-3650 MHz band.

As 4G Americas and other commenters have noted, internationally harmonized spectrum is more likely to result in handheld devices and network equipment that has benefitted from

² FEDERAL COMMUNICATIONS COMMISSION, CONNECTING AMERICA: THE NATIONAL BROADBAND PLAN 84 (2010), *avail. at* <http://download.broadband.gov/plan/national-broadband-plan.pdf> (“National Broadband Plan”).

³ *See e.g.*, Comments of T-Mobile USA, Inc. at 10-11, ET Docket No. 10-123 (filed Apr. 22, 2011); Comments of AT&T Inc. at 6-7, ET Docket No. 10-123 (filed Apr. 22, 2011); *See also*, GARY LOCKE & LAWRENCE E. STRICKLING, U.S. DEPARTMENT OF COMMERCE, AN ASSESSMENT OF THE NEAR-TERM VIABILITY OF ACCOMMODATING WIRELESS BROADBAND SYSTEMS IN THE 1675-1710 MHz, 1755-1780 MHz, 3500-3650 MHz, AND 4200-4220 MHz, 4380-4400 MHz BANDS at 1-6 and 4-84, Table 4-66, Figures 5-2 and 5-3, and App. B (2010), *avail. at* http://www.ntia.doc.gov/legacy/reports/2010/FastTrackEvaluation_11152010.pdf.

⁴ *See* Comments of 4G Americas at 2-3, ET Docket No. 10-123 (filed Apr. 22, 2011); Ex parte letter of 4G Americas, ET Docket No. 10-123 (filed June 24, 2011).

⁵ *See* National Broadband Plan at 84, Exhibit 5-E: Actions and Timeline to Fulfill 300 MHz Goal by 2015.

global economies of scale and scope, as well as innovation. While the 3550-3650 MHz band is under discussion as a possible band by the globally-focused 3GPP, the exclusion zones identified by NTIA would undermine most of the economic and societal benefits in the U.S. of a licensed allocation for the band. Accordingly, 4G Americas does not support including the 3550-3650 MHz band towards the goal of making additional spectrum available for licensed commercial mobile broadband. Rather, 4G Americas shares the sentiment of the wireless carriers' presidents in their recent letter to President Obama that the time is now to repurpose internationally-harmonized, paired spectrum for mobile use below 3 GHz to achieve his Wireless Initiative and the Commission's National Broadband Plan's goals.⁶

4G Americas again applauds the Commission for seeking input on ways to promote wireless broadband deployment and looks forward to continuing to work towards our shared goal of fomenting economic growth through mobile broadband use.

Sincerely,



Chris Pearson
President
4G Americas

cc: Chairman Genachowski
Commissioner Copps
Commissioner McDowell
Commissioner Clyburn
Rick Kaplan
Ruth Milkman
Josh Gottheimer
Paul de Sa
Margaret McCarthy
Angela Giancarlo
Louis Peraertz

⁶ See Letter from Ralph de la Vega, AT&T Mobility & Consumer Markets, Pat Riordan, Cellcom, Dan Hesse, Sprint Nextel Corporation, Philipp Humm, T-Mobile USA, Mary Dillon, U.S. Cellular, Dan Mead, Verizon Wireless, & Steve Largent, CTIA-The Wireless Association to Barack Obama, United States President (July 28, 2011), *avail. at* http://files.ctia.org/pdf/CTIA_Letter_28July2011.pdf.