Federal Regulatory Relations

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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January 3, 1995

William F. Caton
Acting Secretary
Federal Communications Commission
Mail Stop 1170
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Dear Mr. Caton:

Re: *RM 8553, Amendments of Parts 21 and 94 of the Commission's Rules to Establish a Channel Plan and Technical Rules for the 37.0-38.6 GHz Band*

On behalf of Pacific Bell Mobile Services, please find enclosed an original and six copies of its *"Statement In Support of Petition For Rulemaking"* in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me at 202-383-6430 should you have any questions or require additional information concerning this matter.

Sincerely,

Denice Harris

Denice Harris

Enclosures

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendments of Parts 21 and 94 of	)	
the Commission's Rules to Establish a	)	RM-8553
Channel Plan and Technical Rules for	)	
the 37.0-38.6 GHz Band	)	
	)	

STATEMENT BY PACIFIC BELL MOBILE SERVICES IN SUPPORT OF PETITION FOR RULEMAKING

Pacific Bell Mobile Services files this statement in support of the Petition for Rulemaking filed by the Fixed Point-To-Point Microwave Section of the Telecommunications Industry Association ("the Section") in the above-captioned proceeding. The Section requests expedited adoption of a channel plan and technical rules for the 37.0-38.6 GHz band. The Section points out that this is needed "so that PCS operators, cellular operators and other common carriers and private operators can use this frequency band to satisfy fixed point-to-point communications needs."[1]

We strongly support this petition because the 37.0-38.6 GHz band soon will be needed to help create "backbone" networks for the interconnection of PCS cell sites and for other PCS uses that will assist in the provision of PCS to the public. Pacific Bell (directly or via its parent company, Pacific Telesis) has participated in all stages of the Commission's broadband PCS proceedings. Pacific Telesis Mobile Services

[1] The Section, p. 1.

is participating in the auction for broadband PCS spectrum. In order to help develop our PCS network, Pacific Bell Mobile Services filed license applications for 38 GHz spectrum (within the 38.6-40.0 GHz band) which are pending before the Commission. As the Section points out, however, "it seems clear that the 38.6-40.0 GHz band will not be adequate to satisfy the demands for such [PCS] uses, and that the channelization of the band should be extended to cover the 37.0-38.6 GHz band as well."[2]

The public interest requires that adequate fixed point-to-point spectrum be made available to help develop PCS networks. In its PCS Rules Proceeding, the Commission found that PCS will provide numerous benefits to the public.[3] Moreover, the record in that proceeding indicates that the public demand for PCS will be tremendous. The Commission summarized the record on PCS demand and benefits as follows:

> Some parties provide estimates of future demand for PCS services. Telocator submits a study concluding that the PCS market could be from 60-90 million subscribers by the year 2002. Motorola Inc. (Motorola) estimates that PCS will have the capability to serve more than 150 million domestic wireless users by the year 2000. APC and California Microwave, Inc. (California Microwave) submit that the PCS industry will create hundreds of thousands of new jobs for our economy, save consumers billions of dollars by providing competition to the cellular service, enhance productivity, and provide the United States with an unparalleled opportunity to lead the world in a $195 billion international industry.[4]

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[2] Id. at 5.

[3] Amendment of the Commission's Rules to Establish New Personal Communications Services, GEN Docket No. 90-314, 8 FCC Rcd 7700, para. 16 (1993).

[4] Id.

Meeting these demands will require timely availability of substantial resources for backbone networks. As the Section explains, timely availability means that the Commission should "make available the 37.0-38.6 GHz spectrum to PCS operators in time for them to use it in designing their systems."[5] This availability will require expedited Commission action given that the broadband PCS auction is already well on its way toward completion.

For the above reasons, the Commission should grant the Section's Petition and adopt a channel plan and technical rules for the 37.0-38.6 GHz band on an expedited basis.

Respectfully submitted,

PACIFIC BELL MOBILE SERVICES

JAMES P. TUTHILL
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Washington, D.C. 20004
(202) 383-6472

Its Attorneys

Date: January 3, 1995

[5] The Section, p. 11.

CERTIFICATE OF SERVICE

I, Cathy Jo Farey, do hereby certify that a copy of the foregoing Statement by Pacific Bell Mobile Services in Support of Petition for RuleMaking was mailed this 3rd day of January, 1995, via first class United States mail, postage prepaid to the party listed below.

Cathy Jo Farey

Eric Schimmel
Telecommunications Industry Association
2001 Pennsylvania Avenue NW
Washington, DC 20006

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Cathy Jo Farey

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