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

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FEDERAL COMMUNICATIONS COMMISSION

In the Matter of	)	
	)	
Amendment of the Commission's Rules Regarding the 37.0-38.6 GHz and 38.6-40.0 GHz Bands	)	ET Docket No. 95-183 RM-8553
	)	
	)	
Implementation of Section 309(j) of the Communications Act -- Competitive Bidding, 37.0-38.6 GHz and 38.6-40.0 GHz	)	PP Docket No. 93-253
	)	

Reply Comments of AT&T Wireless Services, Inc.

AT&T Wireless Services, Inc. (hereinafter "AT&T"), by its attorney, hereby files its reply comments in the above-captioned *Notice of Proposed Rule Making and Order.*[1] AT&T's reply comments are limited to issues relating to (1) a set aside of channels in the 37 GHz band for PCS and CMRS use and (2) the need for industry supported standards to ensure that interference is adequately controlled. In support thereof AT&T states the following:

I. PCS/CMRS Set Aside

Notwithstanding the fact that many A and B block broadband PCS licensees have not yet finalized the technical configuration of their systems, the C block auctions are still taking place and the D, E and F block broadband PCS auctions have not yet commenced,

[1] *In the Matter of Amendment of the Commission's Rules Regarding the 37.0-38.6 GHz and 38.6-40.0 GHz Bands and Implementation of Section 309(j) of the Communications Act -- Competitive Bidding, 37.0-38.6 GHz and 38.6-40.0 GHz*, Notice of Proposed Rule Making and Order, ET Docket No. 95-183 and PP Docket No. 93-253, FCC 95-500, 61 FR 02452, __ FCC Rcd ___, (December 15, 1995) (hereinafter "NPRM").

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the comments in this proceeding support a need for a set aside of some magnitude of 37 GHz spectrum for PCS and CMRS backhaul/backbone purposes. Indeed, PCIA, an organization that speaks for many existing and prospective CMRS providers, requests that 6 channel pairs in the 37 GHz band should be reserved for PCS support spectrum and 8 channel pairs should be reserved for CMRS operations in general.[2] In addition, The PCS Fund, an entity comprised of numerous small to medium sized businesses seeking PCS licenses, supported the need for spectrum for PCS backhaul/backbone purposes as well as TIA's original proposal to reserve 6 channel pairs for a variety of CMRS uses.[3] Based on the demonstration of need for PCS/CMRS backhaul/backbone spectrum, AT&T asserts the Commission should adopt (1) the TIA channelization plan and (2) AT&T's spectrum set aside proposal.

II. Interference Control Issues

A critical issue with respect to the spectrum in the 37 and/or 39 GHz bands, is interference control. Not only is interference control important from a technical standpoint, it is important in terms of bidders' valuations of the spectrum put up for auction. AT&T notes that the National Spectrum Managers Association ("NSMA") and others have been working on technical issues related to the problem of interference

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[2] *Comments of the Personal Communications Industry Association*, p 5.

[3] *Comments of The PCS Fund*, pp. 3 & 11.

control. AT&T recommends that the Commission should evaluate the recommendations of various industry groups that have or will study the interference issues presented in the 37/39 GHz bands, especially those groups which represent a consensus of the affected industries.

Respectfully submitted,

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April 1, 1996

CERTIFICATE OF SERVICE

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