

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

In the Matter of	)	
	)	
Petition for Rulemaking of the Cellular	)	File No. RM-9920
Telecommunications Industry Association	)	
Concerning Implementation of WRC-2000:	)	
Review of Spectrum and Regulatory	)	
Requirements for IMT-2000	)	

To: The Commission

**COMMENTS OF THE CDMA DEVELOPMENT GROUP (CDG)**

The CDMA Development Group (“CDG”) hereby submits these comments in response to the Commission’s *Public Notice*, DA 00-1673, FCC RM-9920 (July 28, 2000) (“Public Notice”). The CDG supports the Cellular Telecommunications Industry Association’s (“CTIA”) Petition for Rulemaking to begin the process of designating additional spectrum for third generation wireless service in a manner consistent with the decisions regarding International Mobile Telecommunications 2000 (“IMT-2000”) taken at the International Telecommunication Union’s (“ITU”) World Radiocommunication Conference 2000 (“WRC-2000”).

The CDG is an international industry association of 100 companies, including the world’s leading manufacturers and operators of digital cellular and PCS systems based on Code Division Multiple Access (CDMA) technology. By working together, CDG members help ensure interoperability among CDMA systems, while expediting the availability of CDMA technology to consumers.

Many of our member operators and vendors are already implementing plans for the deployment of IMT-2000 technologies in the bands in which CDMA systems currently operate. This ability to enhance existing systems is possible due to the clearly defined evolutionary path for second generation CDMA systems to third generation wireless services, or IMT-2000. Additionally, the Commission's flexible licensing policies enable current cellular and PCS carriers to upgrade their systems and networks to meet growing market demands.

Recognizing the rapid growth of mobile systems and consumers' interest in accessing broadband features, the international community has recognized the need for additional spectrum for IMT-2000 in the near future. WRC-2000 acted upon this need by identifying 806-960 MHz, 1710-1885 MHz and 2500-2690 MHz as additional frequency bands to those identified at WARC-92 (1885-2025 MHz and 2110-2200 MHz) for IMT-2000.

One of the key features envisioned for IMT-2000 systems is global roaming. The development of second generation wireless systems was generally deployed without considering the global market or future capabilities of their services. The worldwide telecommunications market, however, has become more integrated as cross-ownership, strategic partnerships, and investments in multiple countries have become more common. Operators and manufacturers are looking for ways to maximize roaming and interoperability, which makes the harmonization of spectrum even more important today than for previous generation systems.

Global roaming within the U.S. cellular and PCS frequency bands, which were included in the bands identified by the ITU for IMT-2000, will be difficult to achieve

because the use of these particular bands differs across various regions. Furthermore, the U.S. PCS frequency band is not aligned with IMT-2000 band plans of other countries. Thus, to facilitate global roaming and gain economies of scale, it is critical that spectrum decisions in the United States be aligned as much as possible with decisions that will result from WRC-2000.

The U.S. Government has been an integral player in gaining acceptance of U.S.-developed third generation standards on a worldwide basis. These efforts to assist U.S. industry, however, will be compromised if the next step of identifying spectrum for these new services is not taken. The U.S. Government, particularly the FCC and the National Telecommunications and Information Administration (NTIA), as the agencies responsible for spectrum allocation and assignment in the United States, plays a vital role in the process of spectrum identification. It is imperative that the United States take a pro-active, leadership role in future international spectrum work. However, it is extremely difficult for the United States to take positions in international fora without first having developed its own domestic policies, which is one of the reasons that the CDG joins CTIA in urging the FCC to begin the rulemaking process regarding this important issue.

The CDG does not envision the process of identifying spectrum within the bands identified at WRC-2000 above 1 GHz to be an easy endeavor. In fact, the CDG respects the difficulties faced by U.S. Government agencies to assist in the implementation of new services to ensure continued competitiveness of the U.S. mobile industry, while also protecting existing services and users of the bands. Very few countries have unencumbered frequency bands in which to implement IMT-2000 given that the

identified bands are all located below 3 GHz and have been recognized for many years as prime frequency bands for various wireless services. The efforts of the Commission and Executive Branch to study the existing and planned uses of these frequency bands, and to consider possibilities of sharing, transition, and timing are matters critical to the future of the overall U.S. wireless market. The CDG fully supports CTIA in encouraging the Commission to ensure that these studies are undertaken as soon as possible.

In sum, the CDG encourages the FCC and NTIA to take a comprehensive approach to the issue of spectrum identification for IMT-2000. A piecemeal approach that considers distinct parts of bands identified by WRC-2000 at different times will place the United States at a significant disadvantage when compared to other countries that are looking at these bands in their entirety. The CDG understands the constraints imposed by the U.S. system of spectrum management and Congressional mandates for spectrum auctions, but encourages the agencies to work together to develop policies that take into consideration the global realities and needs of the industry.

Respectfully submitted,

**CDMA DEVELOPMENT GROUP**

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August 28, 2000