

**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 QUALCOMM INCORPORATED**

QUALCOMM Incorporated hereby submits these comments in response to the Commission's *Public Notice*, DA 00-1673, FCC RM-9920 (July 28, 2000) ("Public Notice"). QUALCOMM supports the Cellular Telecommunications Industry Association's ("CTIA") Petition for Rulemaking to begin the process of designating additional spectrum for third generation ("3G") wireless service in a manner consistent with the decisions recently adopted at the International Telecommunication Union's ("ITU") World Radiocommunication Conference 2000 (WRC-2000) with respect to International Mobile Telecommunications 2000 ("IMT-2000") services.<sup>1</sup>

QUALCOMM is a leader in developing, delivering, and enabling innovative digital wireless communications products and services based on its digital technologies. QUALCOMM is an industry-leading technology company dedicated to growing the wireless industry through

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<sup>1</sup> WRC-2000 identified 806-960 MHz, 1710-1885 MHz and 2500-2690 MHz as spectrum bands that administrations should consider for IMT-2000 terrestrial implementation in addition to those previously adopted at 1992 World Administrative Radio Conference (1885-2025 MHz and 2100-2200 MHz).

technology licensing, CDMA chipsets and system software, satellite-based systems, and new innovations in wireless data products and applications. QUALCOMM's CDMA technology has been licensed to over 75 leading communications manufacturers worldwide. And due to its unsurpassed voice quality, system capacity, privacy and flexibility, CDMA is the recognized global standard for next-generation, digital wireless communications products and services.

The Commission should initiate a comprehensive rulemaking proceeding to identify additional spectrum for the provision of advanced mobile services, including IMT-2000. At WRC-2000, the United States took a leadership role in the overall international effort to identify spectrum for IMT-2000. The FCC should retain this leadership position for the United States by immediately beginning the process to identify domestic spectrum in the 1710-1885 MHz and 2500-2690 MHz bands for advanced mobile services.<sup>2</sup> Due to current uses of these bands, this identification process will not be easy and will require a collaborative effort with the National Telecommunications and Information Administration (“NTIA”), other U.S. Government agencies, and U.S. industry. This effort, however, is crucial to the success of U.S. activities to promote policies at the international level that are consistent with the goal of identifying global harmonized spectrum for advanced mobile services.

U.S. industry and consumers cannot afford for the U.S. Government to delay in developing policies regarding spectrum for 3G services. If the United States delays in developing regulatory and technical policies for the next generation of wireless technologies and services, its leadership position and ability to influence other administrations will be weakened. Experts anticipate tremendous growth of wireless services with 1.2 billion customers having wireless

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<sup>2</sup> It should be noted that within Region 2, which includes North and South America, the majority of countries support the implementation of IMT-2000 services within the 1710-1885 MHz band.

connectivity to the global information infrastructure by 2003. Recognizing the importance of telecommunications development to the overall global economy, the United States must be in the position to advance market friendly wireless principles and propose specific frequency plans that are acceptable both domestically and internationally.

The ITU has already begun to consider various proposals from administrations regarding band pairing for spectrum for IMT-2000 that was identified at WRC-2000. The ITU and other multilateral institutions, such as the Asia-Pacific Economic Cooperation (APEC) and the Inter-American Telecommunications Commission (CITEL) of the Organization of American States, are also examining regulatory and policy principles related to spectrum that can be endorsed by their members. Recognizing the importance of these outcomes to U.S. consumers and the economy, the United States must be an active participant in these international discussions, and thus must have clearly developed regulatory and technical policies in place.

QUALCOMM, therefore, supports CTIA's petition before the Commission and recommends that the Commission undertake a rulemaking that will designate additional spectrum for advanced mobile services as soon as possible.

Respectfully submitted,

**QUALCOMM Incorporated**

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