

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Cellular Telecommunications Industry) RM-9920
Association Petition Regarding)
Third Generation Wireless/IMT-2000))
Services)

COMMENTS OF LUCENT TECHNOLOGIES INC.

Lucent Technologies Inc. (“Lucent”), a global manufacturer of wireless telecommunications network equipment, respectfully submits the following comments in response to the Office of Engineering and Technology (“OET) request for comment on a petition for rulemaking filed by the Cellular Telecommunications Industry Association (“CTIA”).¹ Lucent fully supports the CTIA petition and urges OET and the Commission to initiate a proceeding to designate additional spectrum that can be used to offer third generation (“3G”) wireless services as expeditiously as possible.

IMT-2000 services promise to provide users with ubiquitous fixed and mobile wireless voice, high-speed data, and multimedia services, and worldwide roaming capability. American consumers, however, will not fully benefit from the development of 3G services, unless sufficient and suitable spectrum is allocated to the Commercial Mobile Radio Service (CMRS) for use with more advanced mobile communications applications, including IMT-2000. Thus, Lucent agrees with CTIA’s conclusion that the Commission

¹ See Public Notice, “Comment Invited on Third Generation Wireless/IMT-2000 Petitions,” RM-9911 and RM 99-20, DA 00-1673 (rel. July 28, 2000).

should initiate a rulemaking to begin the process for designating and allocating additional spectrum that can be used to provide 3G services.

Additionally, Lucent agrees that the Commission should, to the extent possible, harmonize US allocations with other IMT-2000 allocations around the world. In addition to facilitating global roaming, harmonization with IMT-2000 allocations globally will allow manufacturers to develop global product platforms, which will reduce manufacturing costs and time to market, to the ultimate benefit of consumers. WRC-1992 identified 230 MHz of spectrum for IMT-2000 in the 1885-2025 MHz and 2110-2200 MHz bands. WRC-2000 identified additional spectrum for IMT-2000 in the bands 806-960 MHz, 1710-1885 MHz and 2500-2690 MHz. The Commission should examine the implications of, and impediments to, implementation of 3G services in these bands and harmonize new domestic CMRS allocations with other IMT-2000 allocations globally to the extent possible.

In conclusion, Lucent urges the Commission to grant CTIA's petition to initiate a rulemaking to begin the spectrum allocation process to support expanded deployment of 3G services as quickly as possible. Analyzing, allocating, and licensing spectrum for 3G will take a significant period of time, and, if the Commission does not act soon, America may find itself lagging behind its global partners. Further, unless the Commission strives to harmonize domestic allocations with IMT-2000 allocations globally, to the extent possible, American consumers will not enjoy seamless global roaming or benefit from global manufacturing economies of scale.

Respectfully submitted,

Lucent Technologies Inc.

By _____

Diane Law Hsu

Corporate Counsel

Lucent Technologies Inc.

8201 Greensboro Dr.

Suite 717

McLean, VA 22102-3800

(703) 873-1077

August 28, 2000