

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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Satellite Industry Association)	
Petition for Amendment of the U.S. Table of)	RM-9911
Frequency Allocations to Designate the)	
2500-2520/2670-2690 MHz Frequency)	
Bands for the Mobile-Satellite Service)	

To: The Commission

OPPOSITION OF IP WIRELESS INC.

IPWireless Inc. ("IPW"), by its attorneys and pursuant to the public notice issued by the Office of Engineering and Technology ("OET") on July 28, 2000,¹ hereby submits these comments in opposition to the petition filed by the Satellite Industry Association ("SIA") on April 28, 2000, seeking reallocation of the 2500-2520 MHz and 2670-2690 MHz bands for the Mobile-Satellite Service.

IPW has developed wireless technology capable of delivering advanced telecommunications capability, including two-way broadband Internet access and distance learning applications to residential subscribers, small and medium businesses and educational institutions. IPW has begun initial deployment of this technology under a developmental authorization in Multichannel Multipoint Distribution Service (MMDS) spectrum in Greensboro, North Carolina. The company is also working with well-established and currently operating ITFS licenses to deploy this technology on Instructional Television Fixed Service (ITFS) channels.

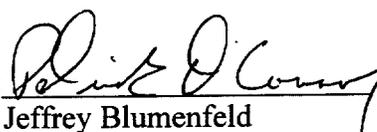
¹ Comment Invited on Third Generation Wireless/IMT-2000 Petitions (RM-9911 and RM-9920), DA 00-1673, Released: July 28, 2000.

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It would be wholly inappropriate for the Commission to begin consideration of the reallocation to the Mobile-Satellite Service ("MSS") of any portion of the 2500-2650 MHz band ("the 2.5 GHz band") currently shared by the ITFS and MMDS services without clear evidence – which SIA has made no effort to present – that the existing and future demands for MSS cannot be satisfied within spectrum bands already allocated to that service. Moreover, the Commission should not consider any reallocation of spectrum from existing terrestrial services to satellite services without considering the full range of policy issues SIA has ignored. These include: 1) the extent of existing and planned terrestrial uses of the band, 2) the benefits associated with such use, 3) the feasibility of band sharing between those existing and planned terrestrial uses and the proposed MSS use, and 4) any rule changes or other transition issues that would need to be resolved and implemented before MSS could be deployed in this band.

For these reasons, IPW urges the Commission to dismiss or, in the alternative, deny the SIA petition.

Respectfully submitted,
IP WIRELESS INC.

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Dated: August 28, 2000

CERTIFICATE OF SERVICE

I, Christopher Lamb, do hereby certify that on August 28, 2000, copies of the foregoing document was served, postage pre-paid, to the parties listed below:



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