

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

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In the Matter of)
)
Amendment of the U.S. Table of) File No. RM-9911
Frequency Allocations to Designate)
the 2500-2520/2670-2690 MHz Frequency)
Bands for the Mobile-Satellite Service)

**COMMENTS OF
THE CELLULAR TELECOMMUNICATIONS INDUSTRY ASSOCIATION**

The Cellular Telecommunications Industry Association ("CTIA")¹ hereby files comments in the above-captioned proceeding pursuant to the Commission's *Public Notice* inviting comments on Third Generation Wireless/IMT-2000 Petitions.² In anticipation of the World Radiocommunication Conference 2000 (WRC-2000) meetings, the Satellite Industry Association ("SIA") filed a petition requesting that the Commission amend the U.S. Table of Frequency Allocations to allocate the 2500-2520 MHz and 2670-2690 MHz bands for Mobile Satellite Service ("MSS").³ SIA notes that the 1992 World Administrative Radio Conference (WARC-92) adopted this allocation

¹ CTIA is the international organization of the wireless communications industry for both wireless carriers and manufacturers. Membership in the association covers all Commercial Mobile Radio Service ("CMRS") providers and manufacturers. CTIA represents more broadband PCS carriers and more cellular carriers than any other trade association.

² *Public Notice*, "Comment Invited on Third Generation Wireless/IMT-2000 Petitions," DA 00-1673, released July 28, 2000.

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internationally, but that no action has been initiated domestically to adopt this allocation in the United States.⁴

Earlier this year, at WRC-2000, the world's nations gathered to coordinate spectrum allocations internationally. CTIA, in a separate petition, has urged the FCC to begin the process of designating additional spectrum for commercial mobile wireless telecommunications service, which will include establishing a rule making proceeding and possibly conducting studies with other federal agencies to determine the viability of certain bands for certain uses.⁵ In that vein, CTIA strongly believes that the Commission should examine all bands identified by WRC-2000 when considering requests for specific allocations for specific services. CTIA's petition stresses the need to conduct an analysis of the 2500-2690 MHz band, which is also the subject of SIA's petition, to fully consider any public interest trade-offs from designating the band or parts of the band for IMT-2000.

In this manner, the FCC can ensure prudent domestic allocations that also, to the extent possible, keep the U.S. in step with the rest of the world regarding deployment of IMT-2000. As CTIA explained more completely in its petition, the opportunity to harmonize the U.S. allocations of spectrum for the development of advanced mobile services can not be missed.⁶ Initiating the process will ensure that the U.S. economy and consumers benefit fully from the next generation of wireless services and technologies.

³ Petition for Rulemaking, Satellite Industry Association, RM- 9911, filed April 28, 2000.

⁴ *Id.*

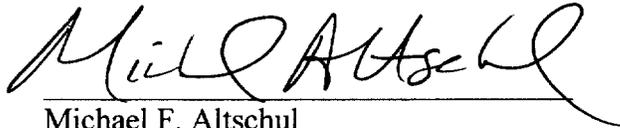
⁵ Petition for Rulemaking, Cellular Telecommunications Industry Association, RM- 9920, filed July 12, 2000.

⁶ *Id.*

Conclusion

For the reasons presented above, the FCC should fully examine spectrum needs of all radio licensees and government users in light of the bands identified by WRC-2000 for IMT-2000 before making specific allocations – and should begin that process now.

Respectfully submitted,



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August 28, 2000

Certificate of Service

I, Dustun L. Ashton, hereby certify that on this 28th day of August 2000, copies of the foregoing "Comments of Cellular Telecommunications Industry Association" were sent by first class mail to the following:

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