

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

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

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COMMENTS OF
LCC INTERNATIONAL, Inc.

LCC International (LCC) is fully supporting CTIA's call to allocate new spectrum for third generation (3G) wireless telecommunication services in accordance with the IMT-2000 decisions recently made at the World Communications Conference in Turkey.

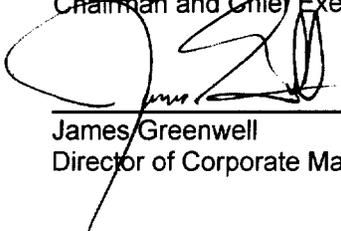
LCC recognizes that the radio spectrum in the United States is highly encumbered and that innovative ways to entice current spectrum residents to vacate spectrum is required. The IMT specifies the following bands for 3G services: 1710-1885 MHz, 1885-2025 MHz, 2110-2200 MHz, and 2500-2690 MHz.

Currently, only 90 MHz from the 1710-1855 MHz paired with the 2110-2150 MHz and 2160-2165 MHz are considered for 3G in the United States. As indicated in the CTIA petition RM 9920, NTIA and the Department of Defense are investigating the potential availability of 1755-1850 MHz for advanced commercial use. If the FCC would indicate its willingness to share a portion of the proceeds from the auction of the 1755-1850 MHz band with the current spectrum owners to reimburse them for their incurred cost for moving, a possible solution could be accelerated and thereby improve the competitiveness of the American telecommunications industry.

Respectfully submitted,

LCC International


C. Thomas Faulders, III
Chairman and Chief Executive Officer


James Greenwell
Director of Corporate Marketing

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Certificate of Service

I, James W. Greenwell, hereby certify that on this 24th day of August 2000, copies of the foregoing "Petition for Rule Making of Cellular Telecommunications Industry Association" were sent by first class mail to the following:

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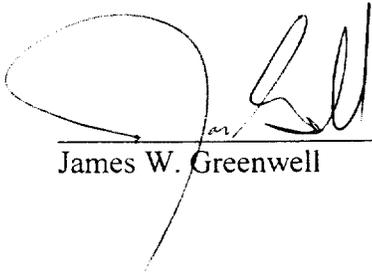
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_____/S/
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