

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

In the Matter of)	
)	
Amendment of Part 2 of the Commission’s Rules to Allocate Spectrum Below 3 GHz for Mobile and Fixed Services to Support the Introduction of New Advanced Wireless Services Including Third Generation Wireless Systems)	ET Docket No. 00-258
)	
Petition for Rulemaking of the Cellular Telecommunications Industry Association Concerning Implementation of WRG-2000; Review of Spectrum and Regulatory Requirements for IMT-2000)	RM-9920
)	
Amendment of the U.S. Table of Frequency Allocations to Designate the 2500-2520/2670- 2690 MHz Frequency Bands for the Mobile- Satellite Service)	RM-9911
)	
To: The Commission		

**COMMENTS OF
THE RURAL TELECOMMUNICATIONS GROUP**

The Rural Telecommunications Group (“RTG”), by its attorneys, hereby respectfully submits these comments in response to the Federal Communications Commission’s (“FCC” or “Commission”) January 5, 2001 *Notice of Proposed Rulemaking* (“*Notice*”) in the above-captioned proceeding. RTG’s members do not look forward to the considerable expense and burden of relocating existing microwave facilities in the 2110-2150 MHz and 2160-2165 MHz bands. However, RTG understands that, as a result of the Commission’s “3G” proceeding, such relocation may be necessary for the deployment of advanced mobile wireless services. As a result, RTG supports the Commission’s proposal in its *Notice* to relocate and compensate these

incumbent common carrier point-to-point microwave licensees in a scheme similar to the one used in the licensing of broadband Personal Communications Service (“PCS”) and Specialized Mobile Radio Service (“SMR”).

I. STATEMENT OF INTEREST

RTG is a group of rural telecommunications providers who have joined together to speed the delivery of new, efficient and innovative telecommunications technologies to the populations of remote and underserved sections of the country. RTG’s members provide wireless telecommunications services, such as cellular telephone service, PCS, and Multichannel Multipoint Distribution Service (“MMDS”) to their subscribers. Many of RTG’s members also hold Local Multipoint Distribution Service (“LMDS”) licenses and are in the process of using LMDS to introduce advanced telecommunications services and competition in the local exchange and video distribution markets in rural areas. Each of RTG’s members is affiliated with one or more rural telephone companies.

II. DISCUSSION

The use of common carrier point-to-point microwave licenses in the 2110-2150 MHz and 2160-2165 MHz spectrum bands is vital to the provision of wireless telecommunications services in rural areas. As a result, RTG supports the Commission’s proposal contained in its *Notice* to compensate 2110-2150 MHz and 2160-2165 MHz fixed microwave service incumbent licensees for relocation to other frequency bands.¹ While such compensation for relocation is currently mandated by sections 101.69-101.83 of the Commission’s Rules,² RTG urges the Commission not to retreat from this proposal or to sunset these rules prior to the relocation of these licensees. Specifically, should common carrier point-to-point microwave licensees in the 2110-2150 MHz and 2160-2165 MHz spectrum bands require relocation from their current allocation to allow for

¹ *Notice* at 50.

² 47 CFR §§ 101.69-101.83

the deployment of “3G” applications, RTG supports the Commission’s proposal that would require new licensees utilizing these bands to complete all activities necessary for implementing the replacement facilities. These activities should include conducting an engineering and cost analysis of the relocation procedures and testing of any replacement facilities to ensure that the new spectrum is compatible with the existing operations of the relocated microwave licensee.³

While the Commission notes that “relocation is not simply a spectrum issue,” and that “incumbents may be relocated using other mediums, such as fiber,”⁴ the Commission should be aware that in rural areas, relocation using replacement spectrum is the most economical option for most rural wireless providers. Replacements mediums, such as fiber, are expensive to initiate in rural areas because of the high costs associated with providing the infrastructure to remote areas. As a result, it is especially important that the Commission commit to supplying specific replacement spectrum to common carrier point-to-point microwave licensees in the 2110-2150 MHz and 2160-2165 MHz spectrum bands and to understand that the same wireless services may not be capable of providing similar services to rural customers using fiber or other wired technology. Since such replacement spectrum should be as close to the 2110-2150 MHz and 2160-2165 MHz bands as possible, RTG suggests that allocations in the 4 GHz or 6 GHz bands are more appropriate than those in the higher 10 GHz and 11 GHz bands.

III. CONCLUSION

Because the 2110-2150 MHz and 2160-2165 MHz spectrum bands are vital to the provision of wireless services in rural areas, RTG supports the Commission’s proposal to require new licensees in these bands to compensate incumbent common carrier point-to-point licensees

³ RTG notes that its support of the Commission’s proposal to compensate and relocate licensees in the 2110-2150 MHz and 2160-2165 MHz bands extends only to existing primary common carrier point-to-point microwave licensees and not to other licensees located in these bands, including Paging and Radiotelephone Service licensees, Local Transmission Television Service licensees and Multipoint Distribution Service licensees.

⁴ *Notice* at 56.

for relocation to alternate spectrum. Additionally, RTG notes that such replacement spectrum should be substantially similar to the current allocation so that rural carriers may continue to provide necessary wireless services in remote and unpopulated areas where the cost of providing fiber or wireline services is prohibitive.

Respectfully submitted,

RURAL TELECOMMUNICATIONS GROUP

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