



February 22, 2001

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: 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 Services, ET Docket No. 00-258

Dear Ms. Salas:

VoiceStream Wireless Corporation ("VoiceStream") hereby submits comments in response to the NPRM in this proceeding regarding identification of spectrum for 3G wireless services. VoiceStream participated in the industry meetings that led to the report submitted on behalf of the wireless industry by the Cellular Telecommunications and Internet Association, the Personal Communications Industry Association, and the Telecommunications Industry Association (the "Association Group"). VoiceStream strongly supports the findings and recommendations contained in the Association Group report. VoiceStream write separately, however, to emphasize the importance of globally harmonized spectrum, and also to urge the FCC to investigate, as thoroughly and as quickly as possible, all sensible possibilities of making spectrum available for mobile 3G services.

Based in Bellevue, Washington, VoiceStream is the fastest growing provider of broadband Personal Communications Services ("PCS") in the United States. Currently serving approximately 4 million subscribers, VoiceStream is the only U.S. wireless carrier that owns and operates a near-nationwide network using the global systems for mobile communications ("GSM") standard – the world's most widely used digital standard. Through pending mergers and recent license purchases, VoiceStream will have a licensed footprint of over 272 million American consumers.

VoiceStream has roaming agreements with more than 125 of the major GSM operators worldwide, allowing customers to use their VoiceStream services while traveling internationally to over 70 countries throughout Europe and Asia. As a result, it is uniquely situated to comment on the importance to U.S. consumers of spectrum harmonization. Globally harmonized spectrum will enhance the roaming opportunities

for U.S. consumers, and will improve the economies of scale for equipment, ultimately benefiting the end user with lower cost wireless devices and service. In addition, U.S. consumers will benefit from quicker introduction of advanced data and voice services, because the U.S. market -- which is now a spectrum island compared to the rest of the world -- is typically the last market to receive innovative new services from its GSM vendors, who tend to focus on markets abroad first. The approximately two dozen other U.S. GSM operators and TDMA operators, such as AT&T Wireless and Cingular Wireless, that are migrating to the GSM standard also would benefit particularly from global frequency harmonization.

The U.S. government has a unique opportunity to realign the U.S. spectrum allocations with the rest of the world. Such seminal opportunities do not present themselves very often. An innovative and expansive solution by the U.S. government would have a positive and dramatic effect on the U.S. information-driven economy for years to come.

The Association Group focused its efforts on developing proposals that would accommodate 3G service providers in the 1710-1850 MHz band and in the 2500-2690 MHz band, while also proposing accommodations for the incumbent users of those bands. VoiceStream strongly believes that spectrum should be allocated for mobile 3G services in both bands. VoiceStream understands the incumbents' concerns; however, the U.S. must thoroughly examine all options with respect to using both of these bands. VoiceStream urges the FCC to review the current uses of the 2500-2690 MHz band and identify alternate spectrum to accommodate incumbent systems.

Furthermore, VoiceStream urges the FCC to look at all other potential 3G bands comprehensively. Some bands (e.g., 1710-1755 MHz) are currently required to be auctioned this year and next year. It does not seem to make sense to auction pieces of the spectrum when the FCC could look at the current direction of wireless technology and industry development in the context of this proceeding. Therefore, VoiceStream recommends waiting until a comprehensive band plan is developed before auctioning any potential 3G spectrum.

Ms. Magalie Roman Salas

February 22, 2001

Page 3 of 3

Many innovative approaches to accommodating both incumbents and 3G service providers in these bands have been discussed within the Association Group meetings. VoiceStream recognizes that much work still needs to be done and is committed to continuing to participate in the industry and government efforts to identify spectrum for 3G mobile services.

Respectfully Submitted,

VoiceStream Wireless Corporation

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