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

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of) ET Docket No. 00-258 /
)
 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)
)
 Petition for Rulemaking of the Cellular) RM-9920
 Telecommunications Industry Association)
 Concerning Implementation of WRC-2000:)
 Review of Spectrum and Regulatory)
 Requirements for IMT-2000)
)
 Amendment of the U.S. Table of Frequency) RM-9911
 Allocations to Designate the 2500-2520/)
 2670-2690 MHz Frequency Bands for)
 the Mobile-Satellite Service)

To: Secretary

**Comments of MMDS Mankato, Inc. and
MMDS Ft. Myers, Inc.**

Comes now MMDS Mankato, Inc. and MMDS Ft. Myers, Inc., and comments on the Notice of Proposed Rule Making released on January 5, 2001 in the above captioned proceeding.

The commenting parties are licensees of MMDS stations in, respectively, Mankato, Minnesota and Ft. Myers, Florida. Principals of these licensees are also principals in a number of other MMDS licensee entities and have been involved with the MMDS spectrum since the original filing dates in 1983. As such, they are well aware of the problems that MMDS licensees have occasioned and the long tortuous road has lead

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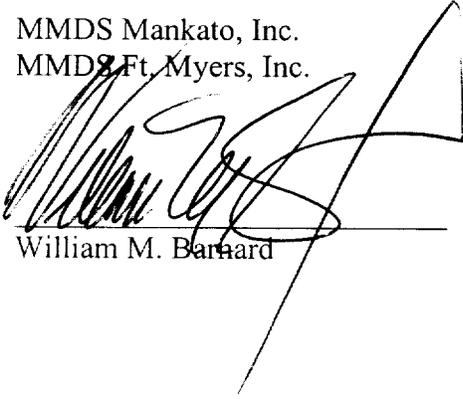
finally to an opportunity to go forward with new technology that will provide data and internet connection services, thus providing a much needed alternative last mile broadband approach. Other commentors in this proceeding are providing information concerning the details of such uses.

On November 15, 2000 the Commission's Office of Engineering and Technology, Mass Media Bureau, Wireless Telecommunications Bureau and International Bureau issued a Staff Report entitled "Spectrum Study of the 2500-2690 MHz Band: The Potential for Accommodating Third Generation Mobile Systems". Interim Report, ET Docket No. 00-232. The commenting parties hereby adopt and incorporate by reference the Staff Report. That report fully details the reasons why migration of the current ITFS-MMDS users is inappropriate and, in fact, not possible on any basis that provides any real degree of comparability. Unless the Commission were able to resolve in an equitable manner consistent with due process, all of the limiting factors identified in the Staff Report, the Commission simply could not abrogate its own spectrum allocation plan to accommodate the 2000 World Radio Communication Conference Resolution.

Respectfully submitted,

MMDS Mankato, Inc.
MMDS Ft. Myers, Inc.

By:


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February 22, 2001