

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of	)	
	)	
Amendment of Part 2 of the Commission's Rules to	)	ET Docket No. 00-258
Allocate Spectrum Below 3 GHz for Mobile and	)	
Fixed Services to Support the Introduction of New	)	
Advanced Wireless Systems, including Third	)	
Generation Wireless Systems	)	
	)	
Petition for Rulemaking of the Cellular	)	
Telecommunications Industry Association	)	RM-9920
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	)	

**REPLY COMMENTS OF THE  
INFORMATION TECHNOLOGY INDUSTRY COUNCIL**

The members of the Information Technology Industry Council ("ITI"), respectfully submit these reply comments in response to the Federal Communications Commission's ("FCC's") recent Notice of Proposed Rulemaking in the above-captioned docket.<sup>1</sup> ITI's member companies, as the leaders of the Internet age, are committed to ensuring that multiple broadband networks, including wireless broadband networks, are developed for consumers. We believe policy makers should view broadband access for

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<sup>1</sup> *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 Systems, including Third Generation Wireless Systems; Petition for Rulemaking of the Cellular 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 Allocations to Designate the 2500-2520/2670-2690 MHz Frequency Bands for the Mobile-Satellite Service* (Notice of Proposed Rulemaking and Order); ET Docket No. 00-258; RM-9920; RM-9911, FCC 00-455 (rel. Jan. 5, 2001).

all Americans by 2010 as a national imperative. Towards this end, we comment in order to emphasize the need for relocation of government systems at 1710-1850 MHz so that this spectrum can be made available for Third Generation ("3G") services.

ITI is the association of the leading information technology companies, including computer hardware and software, Internet services, and wireline and wireless networking. ITI member companies employ more than 1.2 million people in the United States and exceeded \$633 billion in worldwide revenues in 1999. ITI's goal is to ensure the maximum number of consumers have affordable access to high-speed service that will enable them to experience the full potential of the Internet and the information technology revolution. We are pleased to offer you our expertise in information technology, particularly data communications and the Internet.

### **Wireless Networks Provide Another Internet Access Network**

As the leading information technology trade association, ITI supports the development of regulatory and public policy frameworks that promote the rapid development of high-speed, affordable Internet access worldwide. We pursue this goal in a technology neutral way, and across all technology platforms. Third generation mobile wireless services will provide another broadband alternative, generating competition to reduce consumer prices, promoting innovation in service offerings, and making broadband available in some areas of the country where it is not presently offered. As noted by the President's Council of Economic Advisors, wireless data

applications such as 3G hold the promise of bringing tremendous benefits to consumers, telecommunications and Internet providers, and the economy as a whole.<sup>2</sup>

ITI believes that the allocation and licensing of sufficient and globally harmonized spectrum is critical to realizing this goal. The largest barrier to the deployment of wireless data networks in the U.S. is the lack of sufficient spectrum. Without sufficient spectrum allocated to 3G and other wireless data applications, the U.S. stands to quickly fall behind in the wireless data revolution. As we proceed in this process, it is important to keep in mind the timeliness of this effort—spectrum must be allocated in time to meet market needs. Furthermore, spectrum allocated for 3G and Internet access must be unencumbered quickly so deployment can be rapid and without interference. If the wireless data applications are to flourish in the U.S. as they have begun to in Europe and Japan, it is essential that sufficient spectrum be allocated for those services.

**Sufficient, Globally Harmonized Spectrum is Critical to Realizing the Promise of the Wireless Internet: the 1.7 GHz Band is the Best Solution at this Time**

Several commenters have noted that the 2.5 GHz band is already well on the way to providing fixed wireless broadband access to the home for millions of Americans.<sup>3</sup> To relocate these service providers would significantly delay the rollout of

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<sup>2</sup> *The Economic Impact of Third-Generation Wireless Technology*, A Report by The Council of Economic Advisors, October 2000.

<sup>3</sup> See e.g., *Comments of Cisco Systems*, ET Docket No. 00-258, February 22, 2001, at 3.

these competitive broadband services and increase costs to the consumer.

Accordingly, ITI believes that spectrum allocations for 3G should come from the 1.7 GHz band.

The 1.7 GHz band also presents the advantage of being able to be harmonized with global use of the spectrum given its use around the world for commercial mobile services. Harmonization will allow for global roaming and improved interoperability between U.S. and non-U.S. networks. The harmonization of spectrum for 3G services is especially important with regard to the allocations of Canada, Mexico and the rest of the Region 2 countries.<sup>4</sup> Globally harmonized spectrum will also provide economies of scale for manufacturers and operators, thereby decreasing the cost of equipment and services to the consumer.

### **Relocation and Modernization Costs of the Government Should be Reimbursed Through Auction Revenues In Order to Facilitate Fast and Complete Clearing of the Bands**

The government currently uses the 1.7 GHz band for its communications needs, including some essential to our national security. In order to clear the 1.7 GHz band for 3G use, these federal government systems must be relocated from this band, although a phased approach is possible. The relocation and modernization of government systems must be fully reimbursed, and auction revenues should be earmarked towards relocation and modernization of the incumbent communications systems rather than

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<sup>4</sup> See *Comments of Canadian Wireless Telecommunications Association* ET Docket No. 00-258, February 22, 2001, on importance of cross-border traffic.

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being designated as funds for the general treasury. Any government agency required to relocate, as we recommend, should be given a guarantee that relocation of existing systems and modernization of those systems will be fully reimbursed by auction revenues without the threat of any reduction in their other expected appropriations. The government should also be given the option of transitioning certain systems to other commercial services. ITI stands ready to work with Congress and the FCC should legislative changes be necessary to effectuate this guarantee.

### **Conclusion**

ITI appreciates the opportunity to actively collaborate with the FCC and offer our expertise on this important initiative.

Respectfully submitted,

**INFORMATION TECHNOLOGY  
INDUSTRY COUNCIL**

/s Matthew J. Tanielian

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