

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of:)	
)	
Amendment of Part 2 of the Commission's Rules)	ET Docket No. 00-258
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)	

To the Commission:

REPLY COMMENTS OF WORLDCOM, INC.

WorldCom, Inc. ("WorldCom") hereby submits these Reply Comments in response to the comments filed regarding the Commission's Further Notice of Proposed Rulemaking in the above-referenced proceeding. In its Further Notice, the Commission asked for comment on the possible use of the 2150 – 2162 MHz band to support the introduction of new advanced fixed and mobile wireless services, including third generation ("3G") mobile wireless systems. Specifically, the Commission asked whether MMDS licensees should be relocated from the 2150 - 2162 MHz band, and if so, where they should be relocated.

In its Comments, WorldCom explained why any required relocation of MMDS licensees from the 2150 – 2162 MHz band would be highly disruptive, complex and expensive. If, however, the Commission ultimately determines that relocation of MMDS operations from the 2150 – 2162 MHz band is in the public interest, WorldCom emphasized that such a relocation could occur if, and only if: (1) 12 MHz of truly comparable spectrum is identified for relocation; (2) any such relocation spectrum is first

cleared of the incumbent users; and (3) full compensation for all relocation costs is provided to MMDS operators.

Various commenters identified four frequency bands as potential replacement spectrum for MMDS licensees in the 2150 – 2162 MHz band. Those bands are: 1910 – 1930 MHz; 2010 – 2025 MHz; 2185 – 2200 MHz; and 2385 – 2400 MHz. Unfortunately, the commenters do not address the significant technical, legal, economic and logistical issues that must be resolved before the Commission could require relocation to any of the proposed bands. In its Reply Comments to be filed today in this proceeding, the Wireless Communications Association International, Inc. (“WCA”) comprehensively sets forth these issues. WorldCom worked closely with the WCA in identifying these issues.

At present, the record evidence does not show that any of the bands identified by the commenters would provide truly comparable replacement spectrum for displaced MMDS licensees. As WCA’s Reply Comments make clear, further study is clearly necessary. It is imperative that the Commission obtain answers to the these issues set forth by the WCA before requiring any relocation. WorldCom remains committed to working with the Commission to help get answers to these critical issues.

Respectfully submitted,

WorldCom, Inc.

By: _____

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