

**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
)	
Amendment of Section 2.106 of the Commission's Rules to Allocate Spectrum at 2 GHz for Use By the Mobile-Satellite Services)	ET Docket No. 95-18
)	
The Establishment of Policies and Services Rules For the Mobile-Satellite Service in the 2 GHz Band)	IB Docket No. 99-81
)	
Petition for Rule Making of the Wireless Information Networks Forum Concerning the Unlicensed Personal Communications Service)	RM-9498
)	
Petition for Rule Making of UTStarcom, Inc., Concerning the Unlicensed Personal Communications Service)	RM-10024
)	
)	

**REPLY COMMENTS OF
THE BOEING COMPANY**

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SUMMARY

Boeing reiterates its strong objection to the reallocation of any 2 GHz MSS spectrum to other services. The comments filed in this proceeding by terrestrial wireless proponents completely fail to justify the reallocation of any 2 GHz MSS spectrum. Although the terrestrial wireless proponents attempt to justify reallocation by calling into question the viability and spectrum requirements of 2 GHz MSS systems, they yet again fail to raise any evidence that challenges the continued viability of Boeing's proposed satellite-based air traffic management ("ATM") system or the clear benefits to the public that would arise from such services.

Instead, terrestrial wireless proponents rely on the financial difficulties of certain MSS operators outside of the 2 GHz MSS band to demonstrate the lack of viability of *all* MSS operators, regardless of what services they provide or in what frequencies they operate. This argument is seriously flawed, since the difficulties faced by MSS operators in other bands are irrelevant to assessing the viability of 2 GHz MSS systems, which have different technical capabilities and offer different services. As a result, nothing in the comments of the terrestrial wireless proponents shows any change of circumstances that would justify a reallocation of any 2 GHz MSS spectrum to other services.

In particular, the Commission should not reallocate to other services any spectrum "abandoned" by a particular 2 GHz MSS licensee for failure to meet an implementation milestone. Such spectrum is not in any sense of the word "abandoned." The failure of a particular licensee to meet a milestone merely demonstrates the lack of viability of a particular licensee and business plan; it does not indicate a decreased need for 2 GHz MSS spectrum as a whole. Reallocation of "abandoned" spectrum to other services would deny other viable 2 GHz

MSS licensees access to additional needed spectrum resources, which would adversely affect licensees ability to commence operations and to fully develop a mature 2 GHz MSS system.

Boeing also urges the Commission to reject other unnecessary or unjustified proposals supported by the terrestrial wireless proponents.

- A public notice and comment requirement for milestone notification filings is unprecedented and unnecessary. Commission staff is more than capable of assessing whether milestone conditions have been met without the need for public comment. Public comment would also require burdensome confidentiality proceedings and oversight, and would serve no purpose except to provide competitors the chance to delay implementation of 2 GHz MSS systems.

- The Commission should not restrict Selected Assignments of 2 GHz MSS licensees to 3.5 MHz blocks. Such a restriction presupposes a reallocation of all unassigned 2 GHz MSS spectrum to other uses and prevents licensees from obtaining the spectrum resources needed to fully develop their systems.

- 2 GHz MSS licensees should not be required to choose Selected Assignments in contiguous blocks in the order of system launch. This requirement would undermine spectrum efficiency by preventing licensees that utilize spectrum-sharing technologies from selecting adjacent spectrum assignments.

- There is no need to require licensees to be able to operate across the entire 2 GHz band. Such a requirement has already been considered and rejected by the Commission, and no change of circumstance has occurred to warrant a change of that decision.

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To: The Commission

**REPLY COMMENTS OF
THE BOEING COMPANY**

The Boeing Company (“Boeing”), by its attorneys and pursuant to section 1.415 of the Commission’s rules, 47 C.F.R. § 1.415, hereby replies to comments filed in response to the Further Notice of Proposed Rulemaking (“*FNPRM*”) in the above-captioned proceedings.

As a 2 GHz MSS licensee, Boeing reiterates its strong objection to the loss of any 2 GHz MSS spectrum a result of reallocation to other services. Unique among 2 GHz MSS licensees, Boeing proposes to provide Aeronautical Mobile-Satellite (Route) Services to the domestic and international aviation community through a satellite-based air traffic management (“ATM”) and

communications, navigation, and surveillance (“CNS”) system. The proposals set forth in the *FNPRM*, and supported by terrestrial wireless proponents in their comments in this proceeding, threaten to strip away essential spectrum resources needed by Boeing to implement and fully develop its proposed 2 GHz MSS system. As demonstrated in these reply comments, such reallocation continues to be unjustified by the record and must be rejected by the Commission, together with accompanying proposals to change the established service rules set forth in the 2 GHz MSS Order.¹

I. TERRESTRIAL WIRELESS PROPONENTS FAIL TO JUSTIFY THE REALLOCATION OF 2 GHz MSS SPECTRUM TO OTHER SERVICES

The cornerstone of the terrestrial wireless proponents’ argument in this and other related proceedings² is that a purported change of circumstances warrants the reallocation of 2 GHz MSS spectrum, in part or in its entirety, for use by other services. Despite the repeated findings by the Commission that a MSS allocation in the 2 GHz band serves the public interest and that 2 GHz MSS systems require 35 MHz of spectrum in each direction to bring their services to the public,³ terrestrial wireless proponents argue that financial difficulties experienced by a limited few MSS operators in other bands somehow justify stripping spectrum away from 2 GHz MSS

¹ *Establishment of Policies and Service Rules for the Mobile Satellite Service in the 2 GHz Band*, 15 FCC Rcd 16127 (2000) (“2 GHz MSS Order”).

² *See, e.g.*, Petition for Reconsideration of the Cellular Telecommunications & Internet Association, ET Docket Nos. 00-258 and 95-18; IB Docket No. 99-81 (filed Oct. 15, 2001); Application for Review of AT&T Wireless Services, Inc., Verizon Wireless, and Cingular Wireless LLC, DA 01-1631 *et al.* (filed Aug. 16, 2001).

³ *See, e.g.*, Amendment of Section 2.106 of the Commission’s Rules to Allocate Spectrum at 2 GHz for Use by the Mobile-Satellite Service, 12 FCC Rcd 7388, 7395 (1997) (“2 GHz MSS First Report and Order”); 13 FCC Rcd 23949, 23954 (1998) (“2 GHz MSS Recon. Order”) (stating that “The record contains ample evidence that MSS will need at least 70 megahertz of spectrum to meet demand.”).

and reallocating it to other services – before 2 GHz MSS licensees even have the chance to implement their systems.⁴ In making this argument, terrestrial wireless providers attempt to paint all MSS providers with the same brush, regardless of the frequencies in which they operate, the services that they propose to offer, the finances and business plans of the individual licensees, or the variety of public interest benefits such MSS systems promise to confer. Indeed, one terrestrial wireless proponent makes the bold, if not inflammatory, request that the Commission “view all MSS system proponents as a class -- no matter what frequencies they may use -- and conclude that most systems will not succeed.”⁵

Such a request is clearly unfounded and ignores the obvious differences among MSS systems and operators. The terrestrial wireless proponents have tried to lump together all MSS operators indiscriminately in a form of “radio profiling” that must be rejected by the Commission. In particular, the terrestrial wireless proponents fail to show any material changes in the viability and demand for the types of ATM services proposed by Boeing that would justify a reallocation of spectrum resources. The terrestrial wireless proponents also fail to account for the differences among MSS licensees operating in different frequency bands. As a result, any proposal to strip away assigned or unassigned spectrum from 2 GHz MSS licensees, such as Boeing, based on the financial difficulties of some other MSS operators is clearly unjustified and must be rejected.

⁴ See Comments of AT&T Wireless Services, Inc. at 7 (filed Oct. 22, 2001) (“*AWS Comments*”); Comments of Verizon Wireless at 12 n.31 (filed Oct. 19, 2001) (“*Verizon Comments*”); Comments of Cingular Wireless LLC at 7 (filed Oct. 22, 2001) (“*Cingular Comments*”).

⁵ See *AWS Comments* at 7.

A. Terrestrial Wireless Proponents Completely Fail To Address The Continuing Viability and Demonstrated Spectrum Requirements Of 2 GHz MSS Licensees Such As Boeing

Terrestrial wireless proponents would have the Commission believe that all 2 GHz MSS licensees seek to use their allocated spectrum to in the same manner, and that the financial difficulties encountered by a couple of MSS operators in providing primarily voice services demonstrate that all 2 GHz MSS licensees are doomed to similar results. Regardless of what – if anything – the financial difficulties of voice telephony MSS operators in other bands says about the future viability of such services in the 2 GHz band, this line of argument completely ignores the fact that Boeing does not propose to use its 2 GHz MSS license in such a way. Instead, Boeing proposes to use its license to offer highly innovative air traffic management services to the aviation community. The terrestrial wireless proponents conveniently choose to ignore this fact, and raise no questions regarding the public interest benefits of Boeing’s air traffic management services or Boeing’s demonstrated need for eventual access to its entire original spectrum request in order to bring these services to the public.

As a result, there is nothing in the record to show that there has been a change in circumstances concerning the viability of Boeing’s 2 GHz MSS satellite-based ATM services or Boeing’s need to access its entire original spectrum request.⁶ Given the absence of an articulated change in circumstances regarding the provision of Boeing’s ATM services and the obvious negative impact that such reallocation would have on the ability of Boeing to implement and fully develop its proposed system, it is completely unreasonable to reallocate 2 GHz MSS

⁶ As reiterated in its comments in this proceeding, Boeing seeks access to approximately 8 MHz spectrum in each direction in order to meet expected demand for its services. *See* Comments of The Boeing Company at 3 (filed Oct. 22, 2001) (“*Boeing Comments*”).

spectrum to other users while the demonstrated spectrum needs of Boeing and possibly other 2 GHz MSS licensees remain unmet.

B. Financial Difficulties Of MSS Operators In Other Frequency Bands Do Not Indicate A Lack Of Viability On The Part Of 2 GHz MSS Licensees

Terrestrial wireless proponents seek to use the financial difficulties encountered by Big LEO MSS licensees Iridium and Globalstar in order to argue the lack of viability of MSS systems as a whole. This argument is seriously flawed because it totally ignores the obvious differences in technical capabilities and service plans between narrowband voice and low data rate Big LEO operators and 2 GHz licensees. As such, any difficulties encountered by Big LEO operators do not indicate a lack of viability of 2 GHz MSS licensees.

The Commission licensed the Big LEO operators in 1995.⁷ The Commission allocated only 33 MHz of spectrum for Big LEO operator use.⁸ As a result of this limited spectrum allocation and the state of satellite communications technology at the time these systems were licensed, Big LEO systems were designed to provide only low data rate services to the public, primarily narrowband voice services. By contrast, the Commission has allocated 70 MHz of spectrum for MSS services in the 2 GHz band, with the intent that 2 GHz MSS licensees provide a full-range of high data rate services. These 2 GHz MSS services include many of the same advanced wireless services that the terrestrial wireless proponents themselves claim are needed by the public and for which there is a high consumer demand. Thus, 2 GHz MSS licensees not

⁷ International Bureau Grants Three Licenses for “Big LEO” Satellite Systems, FCC Report No. IN 95-4 (Jan. 31, 1995).

⁸ *See Amendment of the Commission’s Rules to Establish Rules and Policies to Pertain to a Mobile Satellite Service in the 1610-1626.5/2483.5-2500 MHz Frequency Bands*, 9 FCC Rcd 5936 (1994).

only utilize different frequencies from Big LEO operators, but also employ different technical capabilities and provide different services.

As a result, the Commission must recognize that any difficulties suffered by narrowband voice and low data rate Big LEO operators are completely irrelevant to the viability of 2 GHz MSS systems. The difficulties of MSS operators in other frequency bands simply do not call into question the need of 2 GHz MSS licensees for the full use of the 70 MHz allocated to their services.

II. THE COMMISSION SHOULD NOT REALLOCATE “ABANDONED” 2 GHZ MSS SPECTRUM TO OTHER SERVICES

A. Failure Of A Particular Licensee To Meet a Milestone Does Not Indicate A Decreased Need for MSS Spectrum As A Whole

Terrestrial wireless proponents assert that any failure of a 2 GHz MSS licensee to meet its implementation milestones would demonstrate the lack of viability of MSS systems as a whole and would justify the immediate reallocation of that 2 GHz MSS spectrum to other uses.⁹ As pointed out by other commenters, this assertion is plainly wrong.¹⁰ The failure of a particular licensee to meet its license milestones merely demonstrates the lack of viability or financial backing of that particular licensee’s proposed system design and business plan. It does not, however, say anything about the viability of other MSS licensees, nor does it support removing that licensee’s assigned spectrum from possible use by other MSS licensees. Other 2 GHz MSS

⁹ See Verizon Comments at 13; Comments of Cellular Telecommunications & Internet Association at 6 (filed Oct. 22, 2001) (“*CTIA Comments*”); Comments of Wireless Communications Division of the Telecommunications Industry Association at 6 (filed Oct. 22, 2001) (“*WCD/TIA Comments*”)

¹⁰ See, e.g., Comments of Globalstar, L.P. at 13-15 (filed Oct. 22, 2001) (“*Globalstar Comments*”).

licensees continue to have an unmet need for additional spectrum resources, regardless of the failure of a particular licensee to meet a milestone.

This is especially true in the case of Boeing, which proposes to use its 2 GHz MSS license to provide satellite-based ATM services that are different from the services proposed by any other 2 GHz MSS licensee. Boeing seeks to provide different services and to serve different markets from any of the other 2 GHz MSS licensees. Thus, the failure of other 2 GHz MSS licensees to meet their implementation milestones does not call into question the Boeing's need to access sufficient spectrum to implement and fully develop its satellite-based ATM system.

B. Reallocation Of “Abandoned” Spectrum Will Harm Boeing’s Reasonable Expectation Of Access To Additional 2 GHz MSS Spectrum Resources Necessary To Fully Develop Its System

As previously stated in its initial comments, Boeing accepted an initial allocation of less than its entire original spectrum request because the Commission left open the promise of a clear regulatory path to additional 2 GHz spectrum resources through a variety of methods, including access to spectrum “abandoned” by other 2 GHz MSS licensees and access to spectrum used by other 2 GHz MSS licensees on a coordinated, secondary basis.¹¹ Proposals by the terrestrial wireless proponents to reallocate “abandoned” 2 GHz MSS spectrum to terrestrial wireless use undermine this clear regulatory path. Under such a proposal, if any 2 GHz MSS licensee missed a milestone for whatever reason (even for reasons completely specific to the individual licensee and unrelated to MSS as a whole), that licensee’s spectrum allocation would be removed from potential use by other more viable 2 GHz MSS licensees. 2 GHz MSS licensees as a whole would suffer the loss of additional spectrum, even though they may offer viable systems and have an unmet need for additional spectrum resources to meet public demand.

¹¹ See Boeing Comments at 4.

Furthermore, as noted in other comments,¹² a key provision of the *2 GHz MSS Order* is the ability of all 2 GHz MSS licensees to operate outside of their Selected Assignments, provided that they can coordinate their operations with other licensees who have also launched their MSS systems.¹³ Such a provision rewards operators who are first to implement their systems and provides a valuable method of obtaining the additional spectrum resources need to implement and fully develop 2 GHz MSS systems. The proposal to reallocate so-called “abandoned” 2 GHz MSS spectrum frustrates this key spectrum-sharing provision of the *2 GHz MSS Order* by decreasing the amount of additional satellite spectrum available for use by 2 GHz MSS systems on a coordinated basis, to the detriment of all 2 GHz MSS licensees.

Without a clear regulatory path to additional 2 GHz MSS spectrum resources in order to fully develop their systems, significant doubt will be placed on the ability of licensees to obtain the funding and financial commitments necessary to initiate service. As a result, the inevitable consequence of the reallocation of so-called “abandoned” spectrum would be to “adversely affect[] the 2 GHz MSS licensees’ ability to commence operations” and to “significantly impair . . . current licensees’ rights and reasonable expectations to retain its current assign spectrum allotment and to acquire additional MSS spectrum for the purposes of deploying and operating a fully mature 2 GHz MSS system.”¹⁴ Since such an outcome violates the express reallocation conditions of the *FNPRM*, the Commission must reject such a proposal.

¹² See Globalstar Comments at 13-14.

¹³ See *2 GHz MSS Order*, 15 FCC Rcd at 16139-40.

¹⁴ See *FNPRM* ¶¶ 22, 29.

C. Public Comment on 2 GHz MSS Milestone Notification Filings Is Unprecedented and Unnecessary

Terrestrial wireless proponents request that the Commission open the milestone notification filings of 2 GHz MSS licensees to a public notice and comment proceeding, so that competitors can challenge a licensee's compliance with the milestones.¹⁵ The Commission must reject such a request as unprecedented and completely unnecessary.

First, Boeing is aware of no precedent to support opening milestone notification filings to such notice and comment requirements. As discussed below, such notice and comment would only be disruptive of orderly Commission procedure and has never been adopted by the Commission. *Second*, such procedures are not only completely unnecessary, but also would require disclosure of confidential financial and technical information to potential competitors. Commission staff is more than capable of determining whether the objective standards of the milestone conditions have been met without the need for additional input from competitors of the licensee. Furthermore, opening milestone filings to public notice and comment would either require licensees to divulge sensitive confidential commercial and technical information to competitors, or would require burdensome confidentiality proceedings and oversight. *Third*, a public notice and comment procedure for milestone notifications serves no purpose other than to provide competitors the chance to draw out and delay the implementation process of satellite operators in the hopes of knocking out applicants and grabbing their spectrum. Such a possibility does not serve the public interest or efficient spectrum management and must be rejected.

¹⁵ See CTIA Comments at 6.

III. THE PROPOSED CHANGES TO THE 2 GHz MSS SERVICE RULES ARE UNNECESSARY AND UNJUSTIFIED

A. Restricting Selected Assignments to 3.5 MHz Blocks Is Not Supported By The Record And Is Not Sufficient To Fully Implement A 2 GHz MSS System

Terrestrial wireless proponents support changing the rules to require each 2 GHz MSS licensee to choose its Selected Assignment in 3.5 MHz blocks.¹⁶ A requirement that 2 GHz MSS licensees must choose their Selected Assignments in 3.5 MHz blocks presupposes that the Commission will reallocate all currently unassigned 2 GHz MSS spectrum to other uses and will perpetually limit 2 GHz MSS licensees to only 3.5 MHz of spectrum in each direction. Such a presupposition is entirely unwarranted, as the record shows that there is no justification for such a reallocation. Boeing urges the Commission to distribute all the presently unassigned 2 GHz MSS spectrum among the qualifying 2 GHz MSS licensees according to the methodology set forth in the *2 GHz MSS Order*.¹⁷ Accordingly, each licensee should choose a Select Assignment of 3.88 MHz in each direction, with a clear regulatory path for access to additional 2 GHz MSS spectrum resources.

Furthermore, the terrestrial wireless proponents mischaracterize the Commission findings when they claim that it has “repeatedly found” that “3.5 MHz is sufficient to provide an MSS service.”¹⁸ Based on this mischaracterization, terrestrial wireless proponents assert there is no need to give MSS operators any more spectrum than that amount.¹⁹ In fact, the Commission has merely stated that 3.5 MHz is sufficient *to commence operations* – not to fully develop a 2 GHz

¹⁶ See CTIA Comments at 8; Verizon Comments at 14; WCD/TIA Comments at 7

¹⁷ See *2 GHz MSS Order*, 15 FCC Rcd at 16138.

¹⁸ See CTIA Comments at 8.

¹⁹ See *id.* at 8.

MSS system.²⁰ Accordingly, the Commission's determination that 3.5 MHz is sufficient to commence operation does not support a 3.5 MHz limit on the amount of spectrum available to 2 GHz MSS licensees to fully develop their systems.

In the case of Boeing's proposed satellite-based ATM system – which will be constructed over a number of years and must ultimately have access to sufficient spectrum to accommodate air traffic managers, controllers, and virtually every aircraft in the air or on the ground – it is clear that access to 3.88 MHz is the minimum amount of spectrum sufficient to commence operations. Full deployment of an advanced, ubiquitous, satellite-based ATM system will in future years require access to the full amount of spectrum that Boeing has consistently requested in its application and its subsequent filings with the Commission. A cap of 3.5 MHz in each direction – as supported by terrestrial wireless proponents – is clearly inconsistent with the Commission's intent to bring 2 GHz MSS services to the public and must be rejected.

B. Requiring Licensees To Choose Selected Assignments In Contiguous Blocks Undermines Spectrum Efficiency Benefits Previously Identified By The Commission

Terrestrial wireless proponents also support a requirement that 2 GHz MSS licensees must choose their Selected Assignment in contiguous spectrum blocks beginning at the top of each paired bands (that is, 2025 MHz and 2200 MHz) and declining in frequency.²¹ The Commission must reject such a proposal due to the serious adverse effect it would have on spectrum efficiency.

In the *2 GHz MSS Order*, the Commission found that licensees that utilized certain spectrum sharing technologies were capable of utilizing overlapping spectrum resources without

²⁰ See *2 GHz MSS Order*, 15 FCC Rcd at 16139.

²¹ See AWS Comments at 9; WCD/TIA Comments at 7; CTIA Comments at 8

the need for large guard bands by aggregating spectrum assignments and reaching sharing agreements.²² For example, several CDMA operators could agree to select and operate in adjacent Selected Assignments and design their spectrum use to overlap each other.²³ Furthermore, the Commission found that ability to choose Selected Assignments throughout the band aided maximum spectrum sharing efficiencies by encouraging shared technology proponents to cooperate during system implementation.²⁴

Such spectrum efficiency would be lost if licensees are required to fill in Select Assignments from the top of each paired band in the order that systems are launched, regardless of technology used or the incompatibility of adjacent systems. An inflexible requirement to choose Selected Assignments from the top down in contiguous spectrum block would discourage licensees from utilizing spectrum sharing techniques and would remove incentives for shared technology proponents to cooperate during system implementation. Because of this serious loss of spectrum efficiency, the Commission must reject any such inflexible spectrum selection requirements.

C. The Commission Has Already Considered And Rejected A Requirement That Licensees Must Be Able To Operate Across Entire 2 GHz MSS Band

Verizon Wireless urges the Commission to require 2 GHz MSS licensees to be able to operate the entire 2 GHz MSS band – rather than 70% as required under established rules – in order to facilitate the potential “repacking” of the band to accommodate advanced wireless

²² See *2 GHz MSS Order*, 15 FCC Rcd at 16141 ¶ 22.

²³ See *id.*

²⁴ See *id.*

services in the future.²⁵ Because the Commission has already considered and rejected such a requirement in the *2 GHz MSS Order* – and nothing has changed to revisit that decision – such a proposal must be rejected now.²⁶

In the *2 GHz MSS Order*, the Commission found that requiring 2 GHz MSS licensee to operate across the entire 2 GHz MSS band was unnecessary given that, as a result of its band arrangement, regional allocation variations for international coordination, and incumbent relocation requirements, 2 GHz MSS systems must already be capable of operating across large portions of the band anyway.²⁷ Nothing since the time of *2 GHz MSS Order* has changed to alter that conclusion. In fact, the *FNPRM* itself does not propose to change the existing 70% requirement.²⁸ Accordingly, the Commission should decline to revisit the settled conclusion of the *2 GHz MSS Order*.

IV. CONCLUSION

In sum, nothing in the comments filed in this proceeding justifies the reallocation of critical 2 GHz MSS spectrum needed by Boeing and possibly others in order to implement their proposed systems. Yet again, terrestrial wireless proponents completely fail to demonstrate any change in circumstances regarding the public benefits of Boeing's proposed system, or Boeing's legitimate spectrum requirements. As a result, the record does not support reallocation of unassigned or abandoned 2 GHz MSS spectrum to other services. Given the continuing unmet

²⁵ See Verizon Comments at 14.

²⁶ See *2 GHz MSS Order*, 15 FCC Rcd at 16152 ¶ 52.

²⁷ See *id.*

²⁸ See *FNPRM* at ¶ 30 (merely noting that “in the *2 GHz MSS Order*, [the Commission] required that 2 GHz MSS systems be capable of operating across at least 70% of the 1990-2025 MHz and 2165-2200 MHz bands.”).

spectrum requirements of Boeing's proposed system, such reallocation to other services would clearly adversely affect the ability of Boeing to commence operations and would significantly impair its rights and reasonable expectations as a licensee to acquire additional MSS spectrum to deploy and implement a fully matured system. Accordingly, the Commission must reject any reallocation of 2 GHz MSS spectrum, together with proposals to alter the established 2 GHz MSS service rules in a manner designed to harm licensees.

Respectfully submitted,

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