

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
FCC Seeks Comment on the National) ET Docket No. 00-258
Telecommunications and Information)
Administration’s Report “An Assessment of)
the Viability of Accommodating Advanced)
Mobile Wireless (3G) Systems in the 1710-)
1770 MHz and 2110-2170 MHz Bands.”)

Comments of the Radio Advisory Board of Canada

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INTRODUCTION

The Radio Advisory Board of Canada (RABC) is a national association which provides broadly based, unbiased and technically expert advice to the Government of Canada and to the Canadian radiocommunication community on all matters related to the management and use of the radio frequency spectrum. The Board's members are associations, commercial consortia and public agencies with important interests in radiocommunications. The Board's members include broadcasters, manufacturers, commercial service providers, carriers, users, public safety agencies, radionavigation agencies and the Department of National Defence.

The RABC is not a lobby group; its advice is offered after its broad membership base has approved it through a formal ballot process.

Further information about the RABC can be found on its web site at www.rabc.ottawa.on.ca



RABC Comments on the NTIA's Report
"An Assessment of the Viability of Accommodating Advanced Mobile Wireless (3G) Systems in the 1710-1770 MHz and 2110-2170 MHz Bands"

The generally accepted principle in Canada for mobile radio services involving a high volume of cross border traffic with the U.S. has been, from service and cost considerations, to ensure harmonization of spectrum allocations and associated technical standards with the corresponding mobile services in the US. This is evident in the current spectrum allocations and technical standards in Canada for PCS, Cellular and ESMR mobile radio services, which have been fully harmonized with the corresponding mobile services in the U.S. For this reason the RABC is greatly interested in the development of plans for spectrum allocations for advanced mobile wireless (3G) services in the U.S., including the plan in the NTIA's report entitled "An Assessment of the Viability of Accommodating Advanced Mobile Wireless (3G) Systems in the 1710-1770 MHz and 2110-2170 MHz Bands (July 22, 2002)", which is the main subject on which the RABC is providing comments in response to the FCC's Public Notice.

With due respect to the privacy and mission of the Department of Defense on matters relating to its own plans and requirements, the RABC therefore, has no desire to become involved in commenting in detail on the specifics of NTIA's plan, known also as the "3G Viability Assessment". Instead, the RABC would prefer to confine its comment on the NTIA's plan of spectrum allocation for 3G systems on an overall basis, chiefly on the desirability of allocating 90-120 MHz of spectrum for 3G systems.

While a key factor for developing any plan for spectrum allocations for 3G systems has been to provide adequate spectrum to ensure the continuing need for increasing the productivity of industry so as to remain competitive globally, the RABC believes that the following findings, taken from the recently released FCC's Seventh Annual Report on the state of competition in the CMRS marketplace, should also be taken into consideration:

- The mobile penetration rate in the U.S. averaging roughly 45% at the end of 2001 would appear to lag considerably with respect to the mobile penetration rate in Western Europe averaging 74.3 % during the same period. Some countries in Western Europe have considerably higher mobile penetration rates in the 80-90% range. In Canada the penetration rate is approaching 35% and the annual growth rate is about 18%.
- The average minutes-of-use per subscriber per month ("MOU's") continued a rapid rise in 2001. According to the CTIA mobile telephone survey, MOUs were 385 between July and December 2001, an increase of 51 per cent from 255 MOU's during the same period in 2000, in addition to a 38 % increase in 1999.
- The mobile data industry has continued to grow and evolve. Estimates of the number of mobile Internet users at the end of 2001 range from approximately 8 to 10 million, up from 2 to 2.5 million at the end of 2000.

The continued vigorous growth of wireless markets in North America would seem to indicate the need for an aggressive spectrum rollout plan from the initial 90 MHz to the full 120 MHz.

The Radio Advisory Board of Canada understands that there is no potential for the release of spectrum in the frequency range 1755-1770 MHz before 2008. However, it is noted that NTIA found that it could relocate virtually all federal non-military fixed links to other federal bands and DoD determined that it could relocate most of its conventional fixed microwave system to other bands.

With the above in mind, there would appear to be considerable merit in continuing to focus on the possibility of an eventual release of an additional 15 MHz of spectrum at 1755-1770 MHz and therefore of the importance of having access to the complete band 2110-2170 MHz to provide 120 MHz of spectrum for 3G systems.

One of the objectives of international efforts in 3G spectrum has been to ensure maximum commonality worldwide. A significant step in that direction would be the adoption of a common base station transmit band at 2110-2170 MHz. In countries adopting 1710-1770/2110-2170 MHz, this band pair would be using exactly a 400 MHz separation. This would enable manufacturers to produce user terminals capable of roaming between countries adopting the so-called UMTS band 2110-2170/1930-1990 MHz and countries employing a 400 MHz band pairing 2110-2170/1710-1770 MHz.

Considering that, in the bands 1710-1770/2110-2170 MHz, it may not be possible to initially make available the sub-band 1755-1770 MHz, it is strongly recommended that the initial release of spectrum be 2110-2155 MHz paired with 1710-1755 MHz.

