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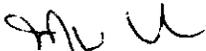
Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
236 Massachusetts Avenue, N.E.
Suite 110
Washington DC 20002

02-258

Dear Secretary Dortch:

On behalf of Siemens, I submit this filing in response to the FCC request for comments on NTIA's final report "An Assessment of the Viability of Accommodating Advanced Mobile Wireless (3G) Systems in the 1710-1770 MHz and 2110-2170 MHz Bands".

Sincerely,



Mark Esherick
Director
Information Technology & Telecommunications

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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

Siemens Comments

Siemens is pleased to submit brief comments in response to the Public Notice in the above-captioned proceeding.¹ Siemens is a global supplier of telecommunications, electronic and electronic investment goods with over 85,000 employees in the United States. Siemens ICM is helping network operators buildout next generation wireless networks and is providing state-of-the-art handset for U.S. consumers.

The Federal Communications Commission (FCC) requests comments on the final report released by the National Telecommunications and Information Administration, "An Assessment of the Viability of Accommodating Advanced Mobile Wireless (3G) Systems in the 1710-1770 MHz Bands." The final report recommends reallocating 90 MHz for 3G services, with 45 megahertz coming from the 1710-1755 MHz band 45 megahertz from within the 2110-2170 MHz band.

¹ Public Notice, DA 02-1780 (released July 24, 2002).

Siemens believes that providing 2x45 MHz of spectrum for 3G applications is a welcome first step. This step, however, can only be viewed in the context of a multi-step process that will eventually open up significantly more spectrum for advanced wireless services over the course of the next 5-10 year period. Most importantly, the U.S. allocations should be harmonized with global allocations to the greatest extent possible to support national and global roaming, enable the production of low cost handsets, and allow for the introduction of new equipment and services more expeditiously.

The evolution of the U.S. wireless market towards 3G has historically been inhibited by problems of spectrum availability. The spectrum allocated for 3G by the ITU in the 2GHZ band is already being used in the U.S. for Personal Communications Services (PCS) second-generation networks. Although some operators have indicated that they plan to deploy their 3G networks in this space (with the FCC's apparent acquiescence), the incongruity between U.S. spectrum plans and the rest of the world is disappointing. If the U.S. market is to go forward on 3G, it is important that the FCC provide regulatory stability and guidance to the industry.

The U.S mobile industry is very supportive of the move to 3G. The industry wrote to President Bush urging the Government to allocate 120MHz of internationally harmonized spectrum in the 1710-1770MHz and 2110-2170 bands. The industry view is that spectrum must be made available for 3G in order to bolster the U.S.'s ability to provide competitive, innovative wireless services that will ensure that the U.S. keeps pace with service developments in Europe and Asia.

In conclusion, Siemens is encouraged by the U.S. decision to open up 2x45 MHz of spectrum for advanced wireless service. We are hopeful that policymakers will

continue down a structured path that leads to the availability of more spectrum that is globally harmonized.

Respectfully submitted,

Mark Esherick

Director, Legislative Affairs-

Information Technology &

Telecommunications