

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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In the Matter of

Proposal to Revise the Multichannel)
Multipoint Distribution Service) RM-10586
and Instructional Television)
Fixed Service Rules)

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: Wireless Telecommunications Bureau

COMMENTS OF WORLDCOMBROADBAND SOLUTIONS, INC.

WorldCom Broadband Solutions, Inc. ("WorldCom") hereby submits its Comments in response to the Commission's October 17, 2002 Public Notice in the above-captioned proceeding. In this proceeding, the Commission seeks comment on the October 7, 2002 white paper entitled "A Proposal for Revising the MDS and ITFS Regulatory Regime" (the "Proposal") submitted jointly by the Wireless Communications Association International, Inc. ("WCA"), the National ITFS Association ("NIA") and the Catholic Television Network ("CTN").

WorldCom, one of the two largest MDS licensees in the U.S., strongly supports the Proposal and urges the Commission to expeditiously issue a Notice of Proposed Rulemaking in this matter. WorldCom further urges the Commission to promptly complete that rulemaking proceeding and issue final rules. The Proposal is the result of many months of hard work by scores of MMDS and ITFS licensees and equipment vendors. WorldCom was an active participant in that process. The consensus achieved

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among the diverse parties is truly extraordinary, and provides a solid foundation for the Commission to move forward.

Adoption of the comprehensive technical and licensing revisions set forth in the Proposal is essential to the development and deployment by MMDS and ITFS licensees of advanced wireless services in the 2.5 GHz band. A new nationwide band plan, geographic area licensing, flexible service rules, and appropriate interference protection rules are critical to the development of advanced services in this band.

For the foregoing reasons, WorldCom urges the Commission to expeditiously issue a Notice of Proposed Rulemaking on the Proposal.

Respectfully submitted,

WORLDCOM BROADBAND
SOLUTIONS, INC.

By: Robert S. Koppel by MSR

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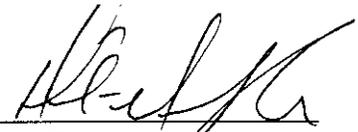
November 14, 2002

CERTIFICATE OF SERVICE

I, De-El Shorter, hereby certify that on this 14th day of November, 2002, I served a copy of the foregoing Comments of WorldCom Broadband Solutions, Inc. by first class U.S. mail, postage prepaid, to the following:

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