



educators, while maintaining interference protection between high-sight, high-power video systems and next generation, cellularized operations.

The proposed **rule** changes are the **result** of extraordinary time and effort on the part of their proponents – virtually the whole of the MDS/ITFS community, supported by vendors from both the fixed and mobile wireless industries. Together, members of the Wireless Communications Association’s Technical Task Group, comprising over 70 members, have spent many thousands of hours developing the rule change proposal to ensure that it is sound from engineering, spectral efficiency and operational perspectives and represents a consensus within the MDS/ ITFS community.<sup>3</sup> Sprint alone spent an estimated 2,500 hours on engineering studies and conferences, fleshing out possible rule changes and their ramifications in order to arrive at the final Proposal. It was only through this unprecedented effort on the part of all members of the Task Force that a comprehensive, fair, and workable overhaul to the existing rules was achieved. Sprint is confident that the proposed rule changes represent a significant improvement over the existing rules, incorporating principles of sound engineering and spectral efficiency, and will lead to the expeditious delivery of state-of-the art wireless broadband services across the nation.

Sprint’s confidence in the soundness of the Proposal is evinced by its own willingness to put its existing MMDS operations on the table and adopt the proposed changes

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<sup>3</sup> *Id.* at footnote 29, stating: “WCA formally commenced the process of re-examining the MDS/ITFS regulatory regime in April of this year when it created a Technical Task Group within its Engineering Committee to explore a variety of technical issues presented by concerns over the efficacy of the current rules. That Technical Task Group, which was open to all WCA members and invited representatives of the ITFS community (including NIA and CTN) ultimately grew to over 70 members, has held over 50 conference calls to date, and exchanged hundreds of e-mails.”

in spite of **the** potential disruption that the changeover process presents! In the long run, any temporary inconvenience and cost associated with transition from the interleaved bandplan adopted in **1963** to the more contemporary bandplan set forth in the Proposal will be rewarded manifold by the improvements in efficiency, flexibility and interference protection.

Sprint urges the Commission to expeditiously open, and quickly resolve consideration of this matter, so that MDS and ITFS licensees and their customers may reap the benefits of an improved licensing structure and more flexible service rules as quickly as possible.

Sincerely,



Jay C. Keithley  
Rikke K. Davis  
401 9<sup>th</sup> Street, NW  
Washington, DC 20004  
(202) 585-1920

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Its Attorneys

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<sup>4</sup> Sprint has invested billions of dollars to obtain MDS licenses, leases of MDS/ITFS capacity and MDS/ITFS multichannel video programming distribution systems. Indeed, with video systems operating today in 55 markets, Sprint is the largest multichannel video programming distributor using MDS/ITFS channels in the country. Nevertheless, Sprint embraces the proposed changes and looks forward to migrating to a new, more efficient, more flexible system that will enable it to offer more advanced services to its customers.