

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

In the Matter of:)	
)	
PROPOSAL TO REVISE)	
MULTICHANNEL MULTIPOINT)	RM-10586
DISTRIBUTION SERVICE AND THE)	
INSTRUCTIONAL TELEVISION)	
FIXED SERVICE RULES)	

REPLY COMMENTS OF NTELOS INC.

NTELOS Inc. hereby submits these reply comments in support of the proposals advanced on October 7, 2002 in the paper jointly submitted by the Wireless Communications Association International, Inc. (“WCA”), the National ITFS Association (“NIA”) and the Catholic Television Network (“CTN”) proposing revisions to the Commission’s Multipoint Distribution Service (“MDS”) and Instructional Television Fixed Service (“ITFS”) rules.

NTELOS Inc., through its affiliates and subsidiaries (collectively “NTELOS”), is a full service telecommunications provider of wireless and wireline services in Virginia and West Virginia. NTELOS is a licensee of spectrum in the MDS, PCS and LMDS bands. We provide PCS service to over 250,000 customers, and our CLEC customer base has grown to over 40,000 lines in communities that include Danville, Lynchburg, Lexington, Staunton, Blacksburg, Charlottesville and Radford, Virginia. NTELOS is

also an incumbent Local Exchange Carrier, as well as providing dial-up Internet access to over 70,000 customers and DSL to over 4,000 customers.

NTELOS holds the MDS Basic Trading Area authorizations in several areas of Virginia and we currently operate wireless cable video distribution systems. An NTELOS representative was an active participant in WCA's Technical Rules Rewrite Group, which met extensively over a period of several months to assist WCA, NIA and CTN in crafting their proposal. NTELOS is pleased with the overwhelming support shown by the commenters in this proceeding for the proposal. Given the clear consensus that has emerged in the comments, we urge the FCC to promptly issue a notice of proposed rulemaking based on the proposal advocated by WCA, NIA and CTN.

NTELOS believes the proposed rule changes will allow us to utilize our spectrum more effectively by permitting us to implement new digital technology. That technology will make it possible to offer broadband services in areas where such services were previously not feasible and so will be especially beneficial in rural areas. The regulatory burdens created by the current rules hinder efforts to implement digital broadband services in timely manner. Those burdens are especially costly to smaller telecommunications carriers serving rural markets. The proposal will dramatically reduce such burdens and will encourage the deployment of broadband services.

Modification of the MDS/MMDS bandplan is especially important and necessary for both the current and future use of this spectrum. The new bandplan gives much more flexibility and productive use of current spectrum, by facilitating the deployment of broadband services but preserving the ability to continue high-power video MDS service if desired. The proposed bandplan removes interleaving and restructures the spectrum to

a more usable format that provides variable spectrum bandwidth needed to implement new technologies for nomadic and mobile data services. NTELOS believes the proposal advanced by WCA, NIA and CTN to transition most video systems to the new bandplan and exempt only those that have significant penetration rates represents a fair balance of the competing interests.

The proposals before the Commission are well-conceived, represent fair compromises among competing interests looking to maximize flexibility for a variety of technologies and are supported, nearly unanimously, by a consensus within the industry. NTELOS applauds the Commission's willingness to consider the proposal and urges the Commission to continue that momentum by adopting the proposals as promptly as possible.

Respectfully submitted,

NTELOS Inc.

By: /s/
Mary McDermott

401 Spring Lane, Suite 300
Waynesboro, VA 22980
(540) 946-3500

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