

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

In the Matter of)
)
Improving Public Safety Communications)
in the 800 MHz Band)
) **WT Docket No. 02-55**
Consolidating the 900 MHz Industrial/Land)
Transportation and Business Pool Channels)

To: The Commission

**REPLY COMMENTS OF
PCIA, THE WIRELESS INFRASTRUCTURE ASSOCIATION
TO THE FEBRUARY 10, 2003 SUPPLEMENTAL COMMENTS OF
ENERGY CORPORATION AND ENERGENCY SERVICES, INC.**

PCIA, the Wireless Infrastructure Association (“PCIA”), by its attorneys and pursuant to Section 1.415 of the Commission’s Rules,¹ hereby files its reply comments to the Supplemental Comments of Entergy Corporation and Entergy Services, Inc. (collectively “Entergy”) of February 10, 2003 regarding the “Supplemental Comments of the Consensus Parties” (“Consensus Plan Supplement” or “Supplement”). The Supplement was submitted by PCIA and other parties (“Consensus Plan Proponents”) on December 24, 2002 in the captioned proceeding. PCIA is filing these reply comments to correct the record regarding statements made by Entergy about PCIA in Entergy’s February 10, 2003 comments.

¹ 47 C.F.R. § 1.415. All references to the Commission’s rules are cited at 47 C.F.R. §§ 0.1 *et seq.*

I. PCIA

For over 50 years, PCIA has had a distinguished history of helping build many key companies that comprise the wireless telecommunications sector. From its beginnings in land mobile radio to paging and messaging, and from personal communications services (“PCS”) to tower and antenna siting, PCIA has been instrumental in facilitating the emergence and growth of core wireless services.

Since the inception of frequency coordination committees in 1970, PCIA has processed hundreds of thousands of applications for licenses and coordinated more of the nation’s spectrum than virtually any other coordinating committee. PCIA was the original coordinator for the Business Radio Service and is currently one of several coordinators in the Business/Industrial/Land Transportation (“B/ILT”) pool and one of two coordinators of the frequencies that were formerly part of the Special Emergency Radio Service (“SERS”).

II. Discussion

In its comments, Entergy questions whether PCIA is representative of private wireless licensees. Entergy bases its argument on PCIA’s name change and certain statements made by PCIA on its web site, in a press release and in comments filed with the Commission.² Unfortunately, Entergy has taken the cited information entirely out of context.

After PCIA ceased to represent the paging industry, PCIA realized that its old name, the Personal Communications Industry Association, did not accurately describe one of its significant remaining constituencies, that is the wireless infrastructure industry.

² Entergy Supplemental Comments at 19-20.

In recognition of the shift in emphasis from paging to wireless infrastructure, PCIA changed its name. Descriptions of PCIA were written to acknowledge the significance of its wireless infrastructure industry constituency.

However, that is not to say that PCIA no longer represents the interests of private wireless licensees. PCIA's frequency coordination activities continue to constitute a substantial portion of its activities, and PCIA remains the largest frequency coordinator of B/ILT channels. Although Entergy makes the claim that Nextel provides to PCIA 20% of PCIA's frequency coordination business,³ Entergy ignores the fact that the vast majority of PCIA's frequency coordination business comes from private wireless licensees. Moreover, a number of private wireless licensees are members of PCIA, and PCIA continues to represent their interests at the Commission and elsewhere. For example, as recently as January 27 of this year, PCIA filed comments in Docket 02-135, the Spectrum Policy Task Force Report, advocating the interests of the private wireless licensees.

Moreover, PCIA emphasizes that despite the aspersions cast by Entergy, PCIA carries out its frequency coordination activities in a completely impartial manner. As required by the Commission's rules and policies, PCIA does not show favoritism to anyone. Every frequency coordination customer is treated equally and fairly. No favoritism is applied to PCIA's members or larger customers. If the Commission were to adopt the proposal of the Consensus Plan to establish a Relocation Coordination Committee ("RCC"), and if PCIA were to be selected to serve on the RCC or any similar committee, PCIA pledges that it will follow the Commission's rules and policies and

³ *Id.* at 19.

conduct its activities in a completely impartial manner as it has always done as a frequency coordinator.

III. Conclusion

As the largest frequency coordinator of B/ILT channels, and with a number of members who are private wireless licensees, PCIA continues to be representative of the private wireless community and continues to advocate at the Commission and elsewhere on their behalf. As a frequency coordinator, PCIA has always acted fairly and impartially and has never shown favoritism, as required by the Commission's rules and policies. If PCIA were to be selected as a member of the RCC, PCIA pledges to follow all Commission rules and policies and to conduct its activities in a completely impartial manner.

Respectfully submitted,

/s/
Jay Kitchen, President
PCIA, the Wireless Infrastructure Association
500 Montgomery Street
Suite 700
Alexandria, VA 22314-1561

(703) 739-0300

February 25, 2003

418400v1