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**FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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Your Ref. FCC 03-16 Third NPRM
Place, Date Göteborg, Sweden, April 11, 2003

Comments regarding Third NPRM 1910-1930 MHz Bands

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of:

Amendment of Part 2 of the Commission's
Rules to Allocate Spectrum Below 3 GHz
for Mobile and Fixed Services to Support
the Introduction of New Advanced Wireless
Services, including Third Generation
Wireless Systems

ET Docket No. 00-258

The Establishment of Policies and Service
Rules for the Mobile-Satellite Service in the
2 GHz Band

IB Docket No. 99-81

Amendment of the U.S. Table of
Frequency Allocations to Designate the
2500-2520/2670-2690 MHz Frequency
Bands for the Mobile-Satellite Service

RM-9911

Petition for Rule Making of the Wireless
Information Networks Forum Concerning
the Unlicensed Personal Communications
Service

RM-9498

Petition for Rule Making of UTStarcom,
Inc., Concerning the Unlicensed Personal
Communications Service

RM-10024

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Comments of Ascom Tateco AB, Sweden

Ascom Tateco AB, globally active Wireless Telecommunications Solutions provider herewith submits its comments on the Third Notice of Proposed Rulemaking ("Third NPRM") in the above-captioned dockets.

In the Third NPRM, among other things, the Commission seeks comment on "whether the FCC should re-designate all or a portion of the UPCS spectrum at 1910-1920 MHz for new fixed and mobile uses," also proposes to "retain the 1920-1930 MHz band for UPCS use," and solicits comment on "whether the FCC should provide for additional flexibility in the 1920-1930 MHz band, as well as any other additional spectrum that is retained for UPCS use."

We like to comment that the isochronous UPCS sub-band is the only unlicensed band in the US (and Canada) that provides a kind of protected spectrum for real time services like voice . It is some of the basic isochronous etiquette rules that provide this protection.

It is therefore important to keep the isochronous UPCS band; it is also proper to extend it to 1910 MHz, since the asynchronous UPCS sub-band 1910-1920 MHz is not in use.

In addition to that we would like to comment that the UPCS spectrum at 1910-1920 MHz should be re-designated for new fixed and mobile uses by deployment of the unlicensed radio interface IMT-2000 FDMA/TDMA, these comments complement each other because of the following reason:

In its recommendations for key characteristics of advanced radio systems, the International Telecommunication Union (ITU) proposes five terrestrial radio interfaces for Advanced Wireless (IMT-2000) services. Four radio interface technologies (CDMA Direct Spread, CDMA Multi Carrier, CDMA TDD and TDMA Single Carrier) offer these services via base stations connected to mobile networks. The fifth terrestrial radio interface (IMT-2000 FDMA/TDMA) offers these services via base stations connected to fixed networks.

The IMT-2000 FDMA/TDMA radio interface is ideal for operating in the 1910-1930 MHz band. The advantage of allowing the 1910-1930 MHz spectrum for voice, voice related and advanced services is that currently the unlicensed spectrum of 2.4 GHz and 5.8 GHz is shared with the explosion of wireless data devices using WIFI technology and several other technologies. This interferes with the transmission and voice quality of voice products being offered in the US.

The US consumer will benefit from the fact that IMT-2000 FDMA/TDMA products have been widely accepted throughout the world for domestic, business and industrial applications, and new applications continue to emerge.

The IMT-2000 FDMA/TDMA radio interface operates world-wide in the 1.9 GHz band, and therefore, the adaptation of this frequency in the U.S offers the opportunity for U.S. companies to bring out products operating in this frequency band both domestically and abroad.

The fixed network operator will benefit from the fact that IMT-2000 FDMA/TDMA products extend future advanced wireless services to the fixed network and to the home.

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The use of inexpensive and widely available technology in the US market will offer a benchmark for voice quality and a standard that all manufactures can address. This standard can be what the WiFi standard of interoperability is for data products. Moreover, other products can be added to this "base" system including integration of telephony and personal security technology, voicemail from your front door (visitor ID), and home automation applications.

Kind regards

Ascom Tateco AB
Managing Director

A handwritten signature in black ink, appearing to read 'Lennart Karlsson', written in a cursive style.

Lennart Karlsson