PHS MoU Group

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PHS MoU Group
Comments On
3G Further Notice of Proposed Rule Making

Comments on Dockets ET 00-258, IB 99-81, RM-9911, RM-9498, and RM-10024

The PHS MoU Group is an international open association of equipment manufacturers and operators of wireless systems using the PHS protocol, Japan Standard RCR28 established by the Association of Radio Industries and Businesses (ARIB). The PHS MoU Group is dedicated to the diffusion of PHS wireless technology worldwide. This technology has been widely deployed in Japan and, more recently, has become extremely popular in Asia as a mechanism to rapidly and cost effectively deploy local telephone service. This growth has made PHS the third most popular wireless standard in the world, behind only GSM and CDMA. The PHS MoU group thanks the Commission for this opportunity to comment on this proceeding.

As in the 2001 proceeding, our primary interest continues to be in the Unlicensed PCS spectrum between 1910 and 1930Mhz. We believe that global markets are best served by having harmonized spectrum allocations across the world, or at least across large regions. This allows for highly cost effective production of devices and serves to increase choices for consumers. As indicated in the earlier proceeding, the Commission of Inter-American Telecommunications (CITEL) Permanent Consultative Committee I (PCC.I) accepted PHS technology for use in the Americas and allocated the spectrum between 1910MHz and 1930MHz to Low Power TDD based systems, including: a) Fixed Wireless Access (FWA), b) low mobility wireless access, c) low-power voice and data application Personal Communications Service (PCS), or d) combination of these applications. Adopting rule changes in the US that will allow for the deployment of PHS, or other technologies, for these applications will further harmonize the US spectrum map with that of the remainder of the Americas and should help both US consumers as well as US exporters.

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With respect to the question of changing the rules on different parts of the current US Unlicensed PCS band, it is clear that PHS can operate on very limited spectrum, even the 5MHz between 1915MHz and 1920MHz. On the other hand, if high speed data services are desired, more spectrum will be necessary. We are including a description of "Advanced PHS" with these notes to show what is possible, including data transmission rates of 1mbps. As most countries in the world have allocated 20MHz or more for low power TDD systems, we believe that it would be in the interest of the US consumer to maintain a similar amount of bandwidth, but with fewer restrictions than are currently in place with respect to technology choices that can be used in that spectrum.

The PHS MoU Group requests that the FCC immediately implement modified rules for the frequencies between 1910MHz and 1930MHz to allow for the operation of globally standard, low power, TDD systems in the unlicensed PCS band. These systems will not interfere with adjacent licensed PCS operations and can provide totally new services to the population. We can envision unlicensed operation, licensing schemes for TDD spectrum consistent with current US policy or, alternately, a far more efficient licensing of only 0.5MHz or 1MHz between 1910MHz and 1913MHz to three or even four separate operators to use for PHS control channels with the remainder of the band shared by all operators to handle traffic.

Respectfully,

Shoichi Sugiura
Secretary General
PHS MoU Group