

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
Amendment of Part 2 of the Commission’s Rules)	ET Docket No.00-258
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)	
)	
Amendments to Parts 1, 2, 27 and 90 of the)	
Commission’s Rules to License Services in the)	
216-220 MHz, 1390-1395 MHz, 1427-1429 MHz,)	WT Docket No. 02-8
1429-1432 MHz, 1432-1435 MHz,)	
1670-1675 MHz, and 2385-2390 MHz)	
Government Transfer Bands)	

COMMENTS OF ERICSSON INC

Ericsson Inc (“Ericsson”) hereby submits comments in response to the Federal Communications Commission’s (“Commission”) Fourth Notice of Proposed Rulemaking, released July 7, 2003, to make available additional spectrum to support the introduction of non-Federal Government Advanced Wireless Services (“AWS”), including third generation wireless (“3G”) systems. The Commission proposes, among other things, to make available spectrum in the 1710-1755 MHz segment by displacing Federal Government operations from the 1710-1850 MHz band and permitting their operation in the 2025-2110 MHz band. In addition, the Commission proposes numerous allocation changes to 2360-2400 MHz band, in order to permit the Department of Defense to further relocate systems out of the 1710-1755 MHz band.

Ericsson supports the Commission’s proposals for the following reasons:

- The continued growth in the use of wireless services has created a need for additional spectrum in order to meet the increasing demands of the industry;

- The proposals would make additional spectrum available to the wireless industry, while also continuing to meet the ongoing needs of Federal Government operations;
- The proposed displacement of Federal Government operations in the 1710-1850 MHz band will help ensure the availability of this band in a timely manner; and
- Clearing is necessary in this band to ensure that commercial operators can continue to invest in advanced services and technologies without concerns of interference and disturbance from other operators, limitations in capacity, as well as regulatory uncertainty that would come from shared use.

Thus, the Commission should move expeditiously to implement the proposed actions. In addition, Ericsson urges the Commission to continue examining additional spectrum allocation as reflected in Ericsson's Global Roaming Plan.¹

DISCUSSION

I. MARKET TRENDS DEMONSTRATE THAT ADDITIONAL SPECTRUM IS NECESSARY TO MEET THE NEEDS OF ADVANCED WIRELESS SERVICES

The growth in the number of mobile wireless users continues to increase significantly. As the National Telecommunications and Information Administration ("NTIA") notes in its 2002 Viability Assessment, which the Commission relies upon, the number of wireless subscribers is expected to grow to 237 million by the end of 2004.² The increase in voice traffic alone continues to underscore the need for most wireless carriers to gain access to more spectrum than they currently have. Since the spectrum is not expected to be available until the 2006-2008 timeframe, impediments to accessing spectrum should be alleviated to ensure timely availability.

¹ Ericsson presented its Global Roaming Plan in ET Docket No. 00-232 in response to the FCC's 2000 Interim Report. *See In the Matter of NTIA Interim Report, November 15, 2000 Federal Operations in the 1755-1850 MHz Band – The Potential for Accommodating Third Generation Mobile Systems, FCC Interim Report, November 15, 2000, Spectrum Study of the 2500-2690 MHz Band – The Potential for Accommodating Third Generation Mobile Systems.*

² *See* National Telecommunications and Information Administration, "An Assessment of the Viability of Accommodating Advanced Mobile Wireless (3G) Systems in the 1710-1770 MHz and 2110-2170 MHz Bands," dated July 22, 2002 ("2002 Viability Assessment").

In addition to the increasing demands of voice messaging, as technology advances, and as more and more customers become accustomed to using advanced mobile services, the demand for new data and mobile internet applications will continue to grow. Continued adoption of AWS systems will put additional strain on existing spectrum use, further increasing the demand for spectrum availability. Despite the additional requirements that will inevitably go hand-in-hand with adoption of emerging technology, the importance of timely implementation has been recognized by the Commission and the NTIA. As the NTIA notes in the 2002 Viability Assessment, U.S. economic security will be enhanced by successful implementation of 3G technology.

Indeed, not only will 3G technology impact the wireless industry itself, which employs hundreds of thousands of employees, but it also promises to enhance the effectiveness and efficiencies of all U.S. businesses, which will provide greater economic opportunities to all Americans. Thus, in order to meet the increasing demands for existing and emerging technologies, it is essential that additional spectrum be made available to the wireless industry. Accordingly, Ericsson supports the Commission's proposal to displace Federal Government operations in the 1710-1850 MHz band to ensure the clearing and availability of the 1710-1755 MHz segment to allow for the introduction of AWS, including 3G systems.

II. THE SPECTRUM BANDS IDENTIFIED BY THE COMMISSION ARE SUFFICIENT TO MEET THE ONGOING SPECTRUM NEEDS OF THE FEDERAL GOVERNMENT

As the 2002 Viability Assessment states, bands 2025-2110 MHz and 2360-2400 MHz can accommodate relocation of certain Federal Government operations that would be cleared out of the 1710-1850 MHz band, making band 1710-1755 MHz available for use with AWS systems. Ericsson supports these conclusions. Ericsson recognizes that the Federal Government, and particularly the Department of Defense, has spectrum requirements that are vital to ongoing operations, many of which are critical to the safety and well-being of the United States. The NTIA,

after thoroughly studying the matter, believes that the identified spectrum bands will satisfy these requirements, including with respect to security and operational flexibility. Therefore, Ericsson supports the conclusion that the Federal Government may safely relocate various operations from the 1710-1850 MHz range, thus clearing and making much-needed spectrum in the 1710-1755 MHz band available to the wireless industry in a timely manner.

CONCLUSION

The tremendous growth in the use of mobile wireless services has created a rapidly increasing need for spectrum availability. In order to support existing and emerging technologies, including implementation of 3G services, it is critical that additional spectrum be made available for use by the wireless industry. Rapid deployment of 3G technology is essential to provide services that are valuable to consumers and the economy. Because there are spectrum bands that can support the relocated systems safely and securely, the Commission should implement its proposals to relocate certain Federal Government operations, and make the 1710-1755 MHz band available to the wireless industry to implement AWS systems. Ericsson further urges the Commission to implement these proposals as swiftly as possible.

Respectfully submitted this 31st day of October, 2003.

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