

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of:)
)
Amendment of Parts 1, 21, 73, 74 and 101 of the) WT Docket No. 03-66
Commission's Rules to Facilitate the Provision of)
Fixed and Mobile Broadband Access, Educational)
and Other Advanced Services in the 2150-2162)
and 2500-2690 MHz Bands)

To: The Commission

COMMENTS OF THE TELECOMMUNICATIONS
INDUSTRY ASSOCIATION

The Telecommunications Industry Association (TIA) responds to the Commission's *Fourth Further Notice of Proposed Rulemaking* (NPRM) in the above-referenced proceeding.¹ TIA is the leading trade association for the information and communications technology (ICT) industry, with 600 member companies that manufacture or supply the products and services used in global communications across all technology platforms. TIA represents its members on the full range of public policy issues affecting the ICT industry and forges consensus on industry standards. For over 80 years, TIA has enhanced the business environment for broadband, mobile wireless, information technology, networks, cable, satellite, and unified communications. TIA is accredited by the American National Standards Institute (ANSI). As discussed below, TIA supports the Commission's proposal to loosen out-of-band-emissions in the Educational Broadband Service (EBS) and Broadband Radio Service (BRS) frequencies, consistent with

¹ *Amendment of Parts 1, 21, 73, 74 and 101 of the Commission's Rules to Facilitate the Provision of Fixed and Mobile Broadband Access, Educational and Other Advanced Services in the 2150-2162 and 2500-2690 MHz Bands*, WT Docket No. 03-66, RM-11614 (rel. May 27, 2011) ("NPRM").

TIA's spectrum policy as well as practical technical design principles, while maintaining that the Commission should ensure that all licensees are adequately protected from harmful interference.

I. TIA SUPPORTS THE COMMISSION'S PROPOSAL TO MODIFY OOBE LIMITS FOR BRS AND EBS MOBILE DIGITAL STATIONS

TIA applauds the Commission's undertaking of a rulemaking in this proceeding, and agrees that the concerns of WCAI expressed in their related petition are valid.² The design of smartphones using 20 MHz channel bandwidths that comply with current OOBE limits for 10 MHz channels is indeed difficult for manufacturers,³ and it is not realistic to comply with the existing U.S. OOBE simply by component alterations. TIA believes that increased flexibility in OOBE limits will promote advances in device technology, and agrees that the mask proposed by WCAI "represents an appropriate and reasonable trade-off between form factor, battery consumption, and performance, particularly for smartphones."⁴

The existence of some mobile devices capable of operating on 20 megahertz channels and meeting the current FCC OOBE rules should not undercut the necessity of these rule changes – as evidenced by numerous manufacturer comments supporting the petition.⁵ Without making the proposed changes, some devices that use 20 MHz channels will not be able to meet existing OOBE requirements.

² See generally Petition for Rulemaking, Wireless Communications Association, International, RM-11614 (filed Oct. 22, 2010) (WCAI Petition).

³ See Comments of Motorola, Inc., RM-11614 (filed Dec. 7, 2010) (Motorola Comment) at 3.

⁴ Reply Comments of Wireless Communications Association International, RM-11614 (filed Dec. 16, 2010) at 10.

⁵ See, e.g., Comments of GCT Semiconductor, RM-11614 (filed Dec. 6, 2010); Comments of HTC America, Inc., RM-11614 (filed Dec. 6, 2010); Comments of Nokia Siemens Networks US LLC and Nokia Inc., RM-11614 (filed Dec. 6, 2010); Motorola Comment.

Making the rule changes proposed is also consistent with spectrum policy principles regularly advocated by TIA, including large, contiguous blocks of spectrum, and the pursuit of global harmonization.⁶ Sitting below 3 GHz, the 2.5 GHz band is ideal for broadband use with channels of 20 MHz wide bandwidths or greater.

The examination of pro-innovation rule changes for the EBS and BRS bands is consistent with TIA's belief that the Commission should prioritize the allocation of wide, contiguous blocks of spectrum. Such provisions help avoid the difficulties associated with fragmentation and encourage the use of wide-bandwidth technologies, consistent with the aims of the Commission as stated in the NPRM.⁷ Furthermore, because the most proficient performance of LTE and WiMAX necessitates 20 MHz or wider channels, larger and wider channels will result in more efficient and effective networks, and will facilitate heightened deployment of Long Term Evolution (LTE) and Worldwide Interoperability for Microwave Access (WiMAX). The allowance of technology intended to work over 20 MHz bands or greater will offer higher data rates than devices confined to 5.5 MHz channels, and will encourage an expanded variety of broadband services and applications. In addition, loosened OOB limits buoy economies of scale in the manufacture of devices, bringing about increased product choice and lower costs.

As noted by the Commission, the proposed changes to OOB limits would lend to global harmonization principles.⁸ Harmonization with global, consensus-based standards will reduce

⁶ See, e.g., Comments of TIA, ET Docket No. 10-123 (filed Apr. 22, 2011) at 4-6.

⁷ NPRM at ¶ 11.

⁸ *Id.* At ¶ 1.

the need for equipment customization in the US, and devices will cost less and come to market more quickly. As proposed the new OOB limits would more closely replicate the international marketplace, and is closer to expected 3GPP modifications to WiMAX standards. In addition, 3GPP has set LTE OOB for 20 MHz channels and up , and component development is in progress. Changing the OOB limits as proposed will harmonize with soon-to-be-available technology that makes use of 20 MHz or more channels.

II. THE COMMISSION SHOULD ENSURE THAT ALL AFFECTED LICENSEES ARE PROTECTED FROM HARMFUL INTERFERENCE

While fully supportive of the Commission's examination in this matter, TIA stresses that the Commission should ensure that it provides all affected licensees necessary protection from harmful interference, particularly uses that involve the protection of health, life and property. The Commission's ongoing protection of primary licensees in the context of this proceeding and others will ensure the ability to provide reliable, continuous service to customers and add value to the protected licenses. This, in turn, will encourage investment in infrastructure, service, devices, and applications by offering heightened certainty from a regulatory perspective. Therefore, TIA agrees with the Commission that existing rules requiring compliance with a tighter emission mask for base stations within 60 days of receiving a documented interference complaint from an adjacent channel licensee can provide adequate protection to adjacent channel licensees with protection against adjacent channel interference.⁹

⁹ *Id.* At ¶ 14.

III. CONCLUSION

TIA appreciates the opportunity to submit comment to the Commission, and urges the Commission to take into consideration of its views consistent with the above.

Respectfully submitted,

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