Dear Assistant Secretary Strickling:

It has been more than eighteen months since leading Members of the House and Senate wrote to the President, stating that, for the sake of job creation, deficit reduction, and to meet our country’s growing broadband needs, the Administration should prioritize re-purposing from federal use internationally-harmonized spectrum below 3 GHz in sufficiently large channel sizes.

We appreciate the steps that you have taken to implement the President’s 2010 directive to make 500 MHz of federal and non-federal spectrum available for commercial mobile wireless use, including the study of the 1755-1850 MHz and other bands. We write to you now to emphasize the industry’s keen interest in the 1755-1780 MHz portion of this band and the need to finalize relocation plans for this sub-band in time to be paired and auctioned with the 2155-2180 MHz band.

The leading technology around the world for commercial mobile broadband is Long Term Evolution (LTE), standards for which have been defined by the Third Generation Partnership Project (3GPP), an international standards organization. Carriers around the world have plans to deploy LTE consistent with 3GPP band plans. The 1755-1780 MHz band, when paired with the 2155-2180 MHz band, aligns closely with 3GPP Band Class 10. Pairing the 1755–1780 MHz band with the 2155–2180 MHz band would allow this spectrum to be auctioned and licensed by February 2015, as the Chairman of the Federal Communications Commission recently noted.1

We recognize that critical federal systems currently occupy the entire 95 MHz of the 1755-1850 MHz band. However, to meet current mobile demand, it is imperative that the government develop relocation plans for the lowest 25 MHz of the band now for an auction in the near-term. These plans should recognize the legitimate requirements of government operations, including long term access to the rest of the band at 1780-1850 MHz, if other spectrum above 3 GHz is not available for relocating those systems deployed on those frequencies.

While the 1755-1780 MHz sub-band is uniquely valuable given international alignment and the spectrum readily available for pairing at 2155-2180 MHz, the remaining 70 MHz—1780-1850 MHz—has significantly less value to the wireless industry as a standalone band. The greatest need for broadband capacity is on the downlink—the link from the base station to user devices. Because the 1780-1850 MHz frequencies are situated between the PCS and AWS

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1 See Letter from the Honorable Julius Genachowski, Chairman, Federal Communications Commission to the Honorable Lawrence E. Strickling, Assistant Secretary for Communications and Information, Department of Commerce, March 20, 2013.
uplink bands, it is more suitable for uplink than downlink operations. Without downlink spectrum available to pair with it, the uplink spectrum at 1780–1850 MHz is of significantly less value to industry at this time and would, with today’s technology, accordingly raise significantly less in any auction.²

Congress has recognized that deploying internationally-harmonized spectrum benefits U.S. citizens through job growth and capital investment. Ensuring spectrum resources are available to mobile carriers will also provide additional auction proceeds to offset deficit reduction and perhaps provide needed offsets to federal agencies.

In addition, more than a year ago, NTIA’s report stated that many federal systems could move off the 1755-1780 MHz sub-band within five years. Indeed, a report from the DOD in 2001 contemplated relocation from the sub-band and provided a cost estimate for such an effort.³ A relocation cost estimate for the sub-band is needed now as well.

In sum, instead of continuing the current course of contemplating reallocating the entire 1755-1850 MHz band at some point in the distant future we strongly urge that NTIA focus the effort on reallocation of the 1755-1780 MHz sub-band as soon as possible. Sharing or relocation studies for the 1780-1850 MHz band should continue in accordance with federal requirements and should take into account the long-term evolution of available technology. However, near-term action to auction the 1755-1780 MHz band paired with 2155-2180 MHz would help relieve the growing pressure for spectrum. At the same time, federal agencies would continue to have access to 1780-1850 MHz for ten years, based on current technology and potential pairing options.

Sincerely,

Kris Rinnie  
Network Technologies SVP  
AT&T Mobility

Chris Pearson  
President  
4G Americas

Neville Ray  
Chief Technology Officer, T-Mobile

Nicola Palmer  
Chief Technology Officer, Verizon Wireless

Steve Largent  
President and CEO, CTIA  
The Wireless Association

² The Department of Defense has proposed relocating systems in the 1755-1850 MHz band to the 2025-2110 MHz band. This would be a mistake. Because much of spectrum use in the bandwidth adjacent to 2025-2110 MHz is for commercial mobile downlink, the 2025-2110 MHz band is far more valuable for downlink than the 1780-1850 MHz band is for uplink. Congressional leaders have stated their preference for relocating federal systems off spectrum below 3 GHz. It does not make policy sense to relocate federal systems from one band below 3 GHz to another—particularly when the new proposed spectrum location could be used to meet growing demand for LTE downlink.

³ See The Potential for Accommodating Third Generation Mobile Systems in the 1710-1850 MHz Band: Federal Operations, Relocation Costs, and Operational Impacts, Table 5-6, at 5-11, Department of Commerce and Department of Defense (March 2001).