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Development of the Coalition Proposal Process and Core Principles

PRESENTED BY

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Events Leading to the White Paper

- Teamwork
- Technical Expertise
- Adherence to Core Principles
- Compromise

Teamwork

- In April 2002, the WCA established the Technical Rules Revision Task Force.
- The Task Force included a diverse array of talented engineers who worked together as a team to explore the technical feasibility of completely overhauling the 2.5 GHz band.

Technical Expertise

- Members of the Task Force included representatives from the WCA, NIA, and CTN, as well as equipment vendors, engineers and consultants.
- Over 50 conference calls and meetings were held over a six-month period.
- Literally thousands of hours were devoted to crafting technical proposals that would meet the needs of a diverse constituency.

Adoption of Core Principles

- Once the technical proposals were complete, commercial operators and educators alike had to evaluate the legal and policy implications of a revised band plan and agree on an appropriate regulatory framework.
- This ultimately resulted in the adoption of eight core principles to guide the decisions of CTN and NIA.

Core Principles

1. ITFS licensees must retain control over the *same amount* of spectrum *in the 2.5 GHz band*.
2. ITFS licensees must be licensed on spectrum that will be used for *all* of the services to be provided in the 2.5 GHz band.
3. If any spectrum in the newly reconfigured band becomes “undesirable” (*e.g.*, guardband), ITFS licensees *must not get a disproportionate share* of undesirable spectrum.

Core Principles *(continued)*

4. Adequate spectrum must be reserved for traditional ITFS services.
5. The cost of transitioning to the new bandplan must be paid by commercial operators.
6. Existing lease agreements must not be abrogated by the new rules.
7. The instructional purpose of the ITFS allocation must be preserved.
8. The new rules must not permit the sale of ITFS spectrum to commercial interests.

Numerous Difficult Issues

- Agreeing on *specific* costs to be paid by commercial parties.
- Agreeing to new interference protection criteria.
- Agreeing on timing and protection of incumbent licensee rights during transitions.
- Agreeing on appropriate digitization standards.
- Agreeing on situations where involuntary modifications are appropriate.

The Need to Compromise

- More efficient and flexible use of ITFS/MMDS spectrum will help ensure that the spectrum stays in the hands of incumbents in the long run.
- Changes to the ITFS/MMDS band to permit mobile and other new uses will make the band more valuable for everyone.

A Reasonable Compromise

- “The white paper represents a complex series of compromises among a variety of competing interests – TDD proponents vs. FDD proponents, emerging MDS broadband providers vs. legacy MDS video providers, ITFS licensees seeking to deploy portable and mobile data services, vs. ITFS licensees more interested in preserving existing video operations, rural interests, vs. urban interests, etc.”

» WCA, NIA, CTN Reply Comments on White Paper filed November 29, 2002.



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Timeline and Overview of NPRM

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Timeline

- 10/17/02 – White Paper filed with FCC
- 10/17/02 – WTB seeks comment on White Paper
- 11/21/02 – Comment deadline on White Paper
- 11/29/02 – Reply comment deadline on White Paper
- 04/02/03 – NPRM adopted by FCC
- 09/08/03 – Comment deadline on NPRM
- 10/23/03 – Reply comment deadline on NPRM
- ??/??/04 – Report and Order to be released

NPRM Issues of Concern

1. Proposed Bandplan
2. Transition to New Bandplan
3. Establishment of Geographic Service Areas
4. ITFS Eligibility
5. Unlicensed Use of Band (FCC)
6. Unlicensed Use of Band (NAF, et. al)
7. Competitive Bidding and Auctions
8. Technical Issues
9. Construction Deadlines and Use requirements
10. ITFS Minimum Use Requirements



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