

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of )  
 )  
Promoting Investment in the 3550-3700 MHz ) GN Docket No. 17-258  
Band )

**REPLY COMMENTS OF THE  
TELECOMMUNICATIONS INDUSTRY ASSOCIATION**

The Telecommunications Industry Association (“TIA”)<sup>1</sup> hereby submits reply comments to the Federal Communications Commission (“Commission”) in response to the Notice of Proposed Rulemaking (“NPRM”) in the above-captioned proceeding.<sup>2</sup> These reply comments focus solely on revising the 3.5 GHz band emissions limits to support 4G LTE and 5G NR channels wider than 10 MHz.<sup>3</sup> The Commission should adopt the Qualcomm proposal as it will allow operators to make use of wider channels, best promote innovation, and enable efficient frequency and power assignments, all while protecting incumbents in adjacent bands.<sup>4</sup>

As TIA noted in our initial comments, the Additional-Maximum Power Reduction (“A-MPR”) required to comply with the emissions limits in the current rules would significantly reduce signal coverage and mobile service quality, thus diminishing the utility of the 3.5 GHz

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<sup>1</sup> TIA is the leading trade association for the information and communications technology (“ICT”) industry, representing 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 policy issues affecting the ICT industry and forges consensus on industry standards.

<sup>2</sup> [Notice of Proposed Rulemaking](#) and Order Terminating Petitions, *Promoting Investment in the 3550-3700 MHz Band*, GN Docket No. 17-258 (rel. Oct. 24, 2017) (“NPRM”).

<sup>3</sup> NPRM ¶ 54; *see also* Qualcomm, [Letter from Dean R. Brenner to Marlene Dortch](#), filed June 19, 2017 in GN Docket No. 12-354 (“Qualcomm Ex Parte”).

<sup>4</sup> *See* [Comments of Qualcomm Incorporated](#), filed Dec. 28, 2017 in GN Docket No. 17-258 (“Qualcomm Comments”).

Band.<sup>5</sup> The record now provides additional support for the Qualcomm proposal. Specifically, many commenters agree that “wider bandwidths will be critical for 5G spectrum,”<sup>6</sup> and that the current OOBE limits are “unduly restrictive and will impair both PAL and GAA operations ....”<sup>7</sup>

Notably, because of the -40 dBm/MHz emissions level in the current rules that applies below 3530 MHz and above 3720 MHz, which is maintained under the Qualcomm proposal, 3.5 GHz operations at the edges of the band are required to lower transmit power level by the same amount regardless of the mask used, as shown by Qualcomm.<sup>8</sup> Nokia also observes that Qualcomm’s proposal “would not have any negative impact to incumbents,” contrary to others’ claims.<sup>9</sup> For these reasons, the Qualcomm proposal should be adopted.

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<sup>5</sup> [Comments of the Telecommunications Industry Association](#), filed Dec. 28, 2017 in GN Docket No. 17-258, at 4.

<sup>6</sup> [Comments of T-Mobile USA, Inc.](#), filed Dec. 28, 2017 in GN Docket No. 17-258, at 18; *see also* [Comments of ATN International, Inc.](#), filed Dec. 28, 2017 in GN Docket No. 17-258, at 9-10 (“ATN agrees with Qualcomm that the emission limits should be relaxed to facilitate wider channels without power reduction”); [Comments of Ericsson](#), filed Dec. 28, 2017 in GN Docket No. 17-258, at 8 (“5G services in particular benefit from wider channels, and changes to the emissions mask to accommodate channels wider than 10 MHz will increase the utility of PALs”); [Comments of Nokia](#), filed Dec. 28, 2017 in GN Docket No. 17-258, at 6 (supporting changes “that would permit easier implementation of wider channels in the band” so long as Commission action happens quickly) (“Nokia Comments”).

<sup>7</sup> [Comments of Verizon](#), filed Dec. 28, 2017 in GN Docket No. 17-258, at 17; *see also* [Comments of the Wireless Internet Service Providers Association](#), filed Dec. 28, 2017 in GN Docket No. 17-258, at 56-57 (“relaxing the out-of-channel mask will confer a benefit on WISP customers ... even a small amount of relief in the mask can have a substantial impact on cost ... Qualcomm’s proposed liberalization is modest”).

<sup>8</sup> Qualcomm Comments at 6. Table 1B shows that the power backoff required for channels at the band edges is the same under the existing mask, the Qualcomm mask and the graduated mask.

<sup>9</sup> Nokia Comments at 2; *cf.* [Comments of the Content Companies](#), filed Dec. 28, 2017 in GN Docket No. 17-258, at 7 (claiming adverse impact); [Comments of the National Association of Broadcasters](#), filed Dec. 28, 2017 in GN Docket No. 17-258 (same).

TIA again urges the Commission to adopt the Qualcomm proposal, and to act promptly on resolving all other proposals in the NPRM to allow CBRS to begin in the near future.

Respectfully submitted,

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

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