



February 18, 2014

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

Re: Recommendations Approved by the Advisory Committee for the 2015 World Radiocommunication Conference (IB Docket No. 04-286); Agenda Item 1.1, “Recommendation B” (IWG-2/027r3 (20.01.14))

Dear Ms. Dortch,

The Telecommunications Industry Association (“TIA”)<sup>1</sup> writes to express its support of the comments filed by Alcatel-Lucent, AT&T, Ericsson, Intel, Motorola Mobility, Nokia, Samsung, Sprint-Nextel, Telecommunications Management Group and Verizon on WRC-15 Agenda Item 1.1, “Recommendation B.”<sup>2</sup>

With the rapid growth of demand for mobile broadband worldwide, mobile broadband access has become a key driver of global economic growth. The sharp increase in mobile-broadband traffic has resulted in an acute need for additional spectrum. U.S. spectrum policy, as expressed in the 2012 Spectrum Act, is to meet the growing demand for spectrum through the use of voluntary incentive auctions to transition broadcast spectrum to mobile use spectrum.<sup>3</sup> In addition, over the past two decades, the U.S. has transitioned from a use-specific spectrum policy to a “flexible use” policy that allows flexibility in spectrum allocations.<sup>4</sup> “Recommendation B” is

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<sup>1</sup> TIA is a Washington, DC-based trade association and American National Standards Institute (ANSI)-accredited standard developer that represent the global information and communications technology (“ICT”) manufacturer, vendor, and supplier community. TIA represents approximately 500 participating companies producing products and services empowering communications in every industry and market, including healthcare, education, security, public safety, transportation, government, the military, the environment, and entertainment. See <http://tiaonline.org/>.

<sup>2</sup> See Recommendation B, filed by Alcatel-Lucent, AT&T, Ericsson, Intel, Motorola Mobility, Nokia, Samsung, Sprint-Nextel, Telecommunications Management Group and Verizon, IB Docket No. 04-286; Agenda Item 1.1, IWG-2/027r3 (dated 20.01.14)

<sup>3</sup> Spectrum Act §§ 6001-6703

<sup>4</sup> See Balanced Budget Act of 1997, Pub. L. No. 105-33, 111 Stat. 251, 268-69; 47 U.S.C. § 303(y) (authorizing the Commission to provide for flexibility of use).

consistent with U.S. spectrum policy and support of the recommendation is appropriate for U.S. global advocacy.

TIA acknowledges that significant transition issues exist for this spectrum in the U.S. The outcome of the pending incentive auctions will impact the amount of useable spectrum available for both broadcasters and wireless providers. In addition, significant questions remain regarding the required transition of public safety users currently operating in the T-band portion of this spectrum.<sup>5</sup> Nevertheless the recommendation to make the USG position regarding 470-806/862 MHz use that Mobile Services be co-primary with Broadcasting reflects domestic US policy.

TIA looks forward to working with the Commission on spectrum management efforts that will allow for continued global economic growth.

Respectfully submitted,

**TELECOMMUNICATIONS INDUSTRY  
ASSOCIATION**

By: */s/ Danielle Coffey*\_\_

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<sup>5</sup> See TIA Comments on Options for 470-512 MHz (T-Band) Spectrum, PS Docket No. 13-42, filed May 13, 2013