



13 December 2005

Mr. Francois Courau
Alcatel
Chair 3GPP TSG RAN
10, Rue Latecoere
78141 Velizy Cedex
FRANCE

Dear Francois:

3G Americas represents leading operators and vendors dedicated to promoting and facilitating the seamless deployment throughout the Americas of GSM and its evolution to 3G and beyond. As a 3GPP Market Representation Partner (MRP), we are proposing and recommending that 3GPP extend the technology standards development of the GSM family of technologies over the entire 1710-1770/2110-2170 MHz spectrum band. It will be important to North, Central and South America to develop technology standards that will ensure roaming and future economies of scale for infrastructure and devices. This can be best accomplished within the full spectrum band available for Advanced Wireless Services in the Americas.

It should be noted that CITELE, the Inter-American Telecommunications Commission (an entity of the Organization of American States), already recognizes the 1710-1770/2110-2170 MHz band for Advanced Wireless services, and many countries throughout the Western Hemisphere have reserved the entire band for future wireless auctions and deployments.

3G Americas considered the following issues that resulted in the aforementioned recommendation:

- The original 3GPP Work Item stated that the full band 1710-1770 MHz paired with 2110-2170 MHz should be specified.
- It is believed that the full band was not developed since the U.S. interest is currently on 1710-1755/2110-2155 MHz. This spectrum will be auctioned in 2006.
- The remaining 1755-1770/2155-2170 MHz was "forgotten" and not scheduled for 3GPP standards specifications.
- It is important from the beginning that the entire 3GPP specifications cover the entire spectrum bands as this is needed in designing the equipment to ensure economies of scale.

- Harmonization of spectrum is vital for roaming since other parts of the Americas may use the entire 1710-1770/2110-2170 MHz band, and other areas of the world could utilize the 2110-2170 MHz for downlink.
- Recently, the U.S. Federal Communications Commission released its Eighth Report and Order identifying 2150-2155 MHz for fixed and mobile services as well as 2155-2175 MHz as additional AWS spectrum. This makes it possible for the U.S. to better align with the international mobile spectrum allocations.

In summary, 3G Americas wishes to emphasize the importance for 3GPP to finalize its work as originally proposed for the entire spectrum band to ensure proper design specifications are made for the equipment and to secure efficient global roaming.

Please do not hesitate to phone or e-mail me with any questions or concerns you might have regarding this 3G Americas proposed recommendation.

Best regards,



Chris Pearson
President
3G Americas, LLC

425 372 8925 office
Chris.Pearson@3gamericas.org