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

In the Matter of

Service Rules for the 746-764 and 776-794 MHz Bands (Television Channels 60-69)

Auction of Licenses in the 747-762 and 777-792 MHz Bands Scheduled for June 19, 2002

To:  Chief, Wireless Telecommunications Bureau

REPLY COMMENTS OF MEMBERS AND SUPPORTERS OF THE SPECTRUM CLEARING ALLIANCE

We, the undersigned members and supporters of the Spectrum Clearing Alliance, hereby submit these Reply Comments in support of those filed by Paxson Communications Corporation ("Paxson") in response to the Public Notice requesting comment on procedures for the upper 700 MHz auction.1 In its comments, Paxson urged the Bureau not to risk delaying the upper 700 MHz auction by linking it with the lower 700 MHz auction in any way. Paxson argued that there are no tangible benefits to linking the auctions, and that doing so creates substantial risks of further delaying the upper 700 MHz auction. Such a delay, Paxson argued, would severely undermine the band-clearing work that the Commission and broadcasters have taken up over the last several years. Paxson also noted that ongoing upper 700 MHz band-clearing efforts

require the Commission’s clear commitment to a pro-band-clearing regulatory
environment, and that any sign from the Commission that it is no longer committed to
voluntary band-clearing will likely doom current efforts. Paxson further argued that if the
Commission delays the auction and forsakes the band-clearing work done by
broadcasters, it will eliminate any chance that the upper 700 MHz band will be cleared
for the introduction of critically needed public safety and new wireless services prior to
the close of the DTV transition.

We support Paxson’s positions and oppose the proposal to link the upper and
lower 700 MHz auction. We hope to reach band-clearing agreements with prospective
wireless entrants that will facilitate the introduction of much-needed public safety and
new commercial services. Any proposal that encourages delay in the upper 700 MHz
auction discourages progress in reaching these agreements. The Commission’s upper
700 MHz band-clearing policies should not be changed or undermined at this late date.
Accordingly, we urge the Bureau to retain the functional separation of the upper and
lower 700 MHz auction and refrain from linking the two auctions in any regard. Most
importantly, however, we urge the Bureau not to delay commencement of the upper
700 MHz auction beyond the scheduled June 19, 2002 start date.

Respectfully submitted,

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Dated: February 26, 2002