

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

In the Matter of)	
)	
Reallocation and Service Rules)	
for the 698-746 MHz Spectrum)	GN Docket No. 01-74
Band (Television Channels 52-59))	
)	
Auction of Licenses in the)	DA 02-200
698-746 MHz Band Scheduled)	Report No. AUC 02-44-A
for June 19, 2002)	(Auction No. 44)
)	

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”) responding to the Wireless Telecommunications Bureau’s *Public Notice* requesting comment on procedures for the lower 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 regard. Paxson argued that further auction delay would frustrate considerable Commission and broadcaster efforts to clear the upper 700 MHz band and facilitate the introduction of critically needed public safety and new wireless services. Paxson expressed concern

¹ See Auction of Licenses in the 698-746 MHz Band Scheduled for June 19, 2002: Comments Sought on Reserve Prices or Minimum Opening Bids and Other Auction Procedural Issues, *Public Notice*, DA 02-200, Report No. AUC-02-44-A (Auction No. 44) (rel. Jan. 24, 2002) (“*Public Notice*”).

that the Bureau's proposal to group the EAG licenses from both the upper and lower 700 MHz auctions could result in delaying the upper 700 MHz auction, given that postponement of the lower 700 MHz auction is quite foreseeable due to prospective bidders' limited opportunity to plan for auction of the more heavily encumbered lower 700 MHz spectrum. Paxson noted that the Bureau offered no articulated benefit for such a risky proposal.

We support these Paxson positions and urge the Bureau not to take any action that would risk delaying the upper 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. The Commission's complex upper 700 MHz band-clearing orchestration should not be 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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