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October 31, 2019

EX PARTE VIA ELECTRONIC FILING

Marlene Dortch
Secretary
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

Re: Expanding Flexible Use of the 3.7 to 4.2 GHz Band, GN Docket No. 18-122

Dear Ms. Dortch,

On October 29, 2019, Neeti Tandon, Michael Goggin, Raquel Noriega, and joining by telephone, David Wolter and Navid Motamed, of AT&T Services, Inc. (AT&T) met with Kenneth Baker, Blaise Scinto, Anna Gentry, Jonathan Campbell, Janet Young, and Paul Powell of the Wireless Telecommunications Bureau, Jose Albuquerque of the International Bureau, and Michael Ha, Ira Keltz, Bahman Badipour and Robert Pavlak of the Office of Engineering and Technology. Brian Wondrack of the Wireless Telecommunications Bureau joined the meeting via telephone.

During the meeting, AT&T reiterated the positions advanced in the *ex parte* letter dated October 22, 2019.¹ In particular, AT&T argued that for FSS/5G co-existence, the Federal Communications Commission can and should adopt technical rules that fully protect FSS operations while limiting unnecessary and impractical obligations on 5G licensees by: (i) employing a Power Flux Density (“PFD”) threshold for validating 5G harmful interference to FSS earth stations; and (ii) recognizing that 5G channels greater than 50 megahertz removed from the FSS band edge or 5G base stations located at least 4 km away from a registered C-band earth station will have no measurable impact on earth station operation. AT&T also argued that the Commission should also address protection of grandfathered Telemetry, Tracking and Control earth stations on a highly individualized basis, including requiring investments in site-specific interference management tools, and reject the preclusive effect of the overbroad generic regulations on 5G deployments proposed by the C-Band Alliance (“CBA”). Further, AT&T submitted that although the CBA plan to create “virtual” registrations for occasional use (“OU”) FSS registrations for 500-700 venues across the country will address a breadth of OU applications, the plan is unlikely to prove satisfactory to C-band satellite

¹ Letter dated October 22, 2019 from Michael Goggin, AT&T, to Marlene Dortch, FCC, GN Docket No. 18-122.

users, as it still does not provide solutions for OU activities at temporary venues or the need to occasionally modify OU usage at existing venues. Moreover, it is unlikely to prove satisfactory to mobile interests, as it could prevent 5G deployments on mid-band spectrum in areas where it would be in high demand. As a result, AT&T argued during the meeting that further study will be required to ensure that vital OU services can be preserved without unduly diminishing the utility of the band for terrestrial 5G services.

Please contact me if you have any questions related to these matters.

Sincerely,

/s/

Raquel Noriega

cc:

Kenneth Baker, WTB

Paul Powell, WTB

Blaise Scinto, WTB

Brian Wondrack, WTB

Anna Gentry, WTB

Jonathan Campbell, WTB

Janet Young, WTB

Jose Albuquerque, IB

Michael Ha, OET

Ira Keltz, OET

Robert Pavlak, OET

Bahman Badipour, OET