



July 5, 2016

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20510

Jeffrey A. Marks
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Re: *Notice of Ex Parte Presentation, Use of Spectrum Bands Above 24 GHz for Mobile Radio Services, GN Docket No.14-177; IB Docket No. 15-256; RM-11664, WT Docket No. 10-112; IB Docket No. 97-95*

Dear Ms. Dortch:

On July 5, 2016, Prakash Moorut (by telephone) and Jeffrey Marks of Nokia met in separate meetings with (1) Edward Smith and Ariel Diamond, Office of Chairman Tom Wheeler; (2) Johanna Thomas, Office of Commissioner Jessica Rosenworcel; (3) Brendan Carr, Office of Commissioner Ajit Pai; and (4) Erin McGrath, Office of Commissioner Michael O’Rielly, regarding the above-captioned proceedings. The focus of each meeting was the framework for terrestrial-satellite coexistence in the 28 GHz Band.

The Nokia representatives described their company’s efforts (along with several other industry partners) to meet with individual satellite operators, convened through the Satellite Industry Association, to exchange information on the technical parameters of terrestrial operations and satellite operations in the 28 GHz Band. To amplify the value of the information exchange, Nokia also devoted substantial engineering resources to run simulations and provide technical analysis for discussion of such coexistence, which were presented at a series of meetings. Results from these coexistence studies were also submitted to the Commission.¹ Among Nokia’s key conclusions was that it is not expected that aggregate interference from 28 GHz Band terrestrial operations will cause harmful interference

¹ See, e.g., Letter from AT&T Services Inc., (“AT&T”); Ericsson (“Ericsson”); Nokia (“Nokia”); Samsung Electronics America (“Samsung”), T-Mobile USA, Inc. (“T-Mobile”) and Verizon (“Verizon”) (together, the “Joint Filers”) to Marlene H. Dortch, Secretary, Federal Communications Commission, GN Docket No. 14-177 *et al.* (filed May 6, 2016); See Letter from the Joint Filers to Marlene H. Dortch, Secretary, Federal Communications Commission, GN Docket No. 14-177 *et al.* (filed May 12, 2016); Letter from the Joint Filers to Marlene H. Dortch, Secretary, Federal Communications Commission, GN Docket No. 14-177 *et al.* (filed June 1, 2016) (“June 1 Joint Letter”).

into satellite receivers (GSO and NGSO), and that limitations on terrestrial operations would not be required to mitigate against such interference.²

As noted above, Nokia approached these technical discussions to determine technical coexistence parameters based on a mutual exchange of data and engineering analysis of that data. Nokia offered to continue these valuable technical discussions, but was disappointed that the satellite industry ended them based on claims that they could not move forward without elevation of satellite operations to “co-primary” status.³ Notwithstanding the further value that could have been gained through further discussions, Nokia asserts that the discussions yielded greater technical understanding by all parties involved. Based on the knowledge that Nokia was able to learn from the satellite industry about the technical characteristics of their satellite systems, Nokia was able to provide a more informed record for the Commission’s consideration in this important proceeding.

Please contact the undersigned with any questions in connection with this submission.

Respectfully submitted,

/s/ Jeffrey A. Marks

Jeffrey A. Marks

cc: Edward Smith
Ariel Diamond
Johanna Thomas
Brendan Carr
Erin McGrath

² June 1 Joint Letter at 1.

³ *See, e.g.*, Letter from the Satellite Industry Association to Marlene H. Dortch, Secretary, Federal Communications Commission, GN Docket No. 14-177 *et al.* at 2 (filed June 1, 2016).