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Via Electronic Filing

July 7, 2016

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

Re: Notice of Ex Parte Communication: *In the Matter of Use of Spectrum Bands Above 24 GHz For Mobile Radio Services Notice of Proposed Rulemaking*; GN Docket No. 14-177

Dear Ms. Dortch:

This letter supplements our letter of July 5 in which we observed performance differences between the 28 GHz band and the new band at 37-39 GHz. In that letter, we noted that the 37-39 GHz band stands in a slightly different posture than the 28 GHz band – it sits approximately 10 GHz higher and our preliminary calculations suggest that, to achieve the same performance results, a carrier using 37-39 GHz spectrum will require approximately 50 percent more spectrum than a carrier deploying in the 28 GHz band. We argued that these performance factors should be taken into consideration in formulating licensing and spectrum aggregation policies, as a uniform approach between the two bands could produce unintended results that ultimately undermine competitive and innovative 5G deployment in the U.S.

Attached please find an engineering analysis from the AT&T Advanced Wireless Technology Group that supports those observations. In accordance with the Commission's rules, this letter is being filed electronically with the Secretary for inclusion in the public record.

Sincerely,

A handwritten signature in black ink, appearing to be 'Joan Marsh', with a long horizontal line extending to the right.

Joan Marsh

cc: Jon Wilkins  
Julie Knapp  
Brian Regan

**AT&T**