August 20, 2015

SUBMITTED ELECTRONICALLY

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

Notice of Ex Parte Communication

Dear Ms. Dortch:


We expressed our plans to deploy the Long Term Evolution (“LTE”) technology that is being developed for use on unlicensed spectrum (“LTE-U”), to enhance our customers’ overall experience by providing greater capacity and improving their quality of service in areas of high demand. We discussed our industry leading use of Wi-Fi technology. In a highly competitive wireless marketplace, T-Mobile has innovated with Wi-Fi to improve our coverage to enable our customers to make calls and access the Internet inside buildings and the home. T-Mobile expressed its strong commitment to ensuring that Wi-Fi remains robust and is not adversely impacted by the deployment of LTE-U.

T-Mobile explained that the FCC’s technology-neutral approach to use of the unlicensed bands has been highly successful, and there is no reason to deviate from that approach as LTE-U meets all Part 15 requirements and includes strong coexistence mechanisms. Testing shows that LTE-U has less of an impact on Wi-Fi operations than would occur by adding an additional Wi-Fi access point.1/ We also explained that if multiple operators deploy LTE-U in an area, the access

1/ See Letter from Dean R. Brenner, Senior Vice President, Government Affairs, QUALCOMM Incorporated, to Ms. Marlene H. Dortch, Secretary, FCC, ET Docket No. 15-105 (filed July 15, 2015); see also Reply Comments of QUALCOMM Incorporated, ET Docket No. 15-105, at 4-5 (filed June 26,
points treat each other as another user and take those operations into account just as they would additional Wi-Fi access points, as part of a fair sharing approach. Claims by LTE-U opponents, particularly cable companies, that the technology will adversely impact Wi-Fi operations are based on testing with parameters set at extremes that do not represent realistic deployments or do not reflect actual LTE-U specifications. While cable companies defend these tests by noting that carriers have the ability to adjust LTE-U parameters, the ability to adjust parameters allows a carrier to refine operations based on the environment – a result that will promote equitable sharing. Further, LTE-U’s connection to licensed spectrum through a control channel allows carriers to better address problems if they should occur. We indicated our intent to begin LTE-U trials in 2016, but expressed our support for fair and neutral testing to demonstrate compatibility based on reasonable and realistic deployment scenarios.

T-Mobile emphasized that the rapid deployment of LTE technology in unlicensed spectrum promotes innovation and consumer benefit without consumer harm and should not be blocked by the self-interest of cable companies seeking to limit competition.

Pursuant to Section 1.1206 of the Commission’s rules, an electronic copy of this letter is being filed for inclusion in the above-referenced docket. A copy of this letter is also being provided to FCC staff that participated in each meeting.

Please direct any questions regarding this filing to the undersigned.

Respectfully submitted,

/s/ Steve B. Sharkey

Steve B. Sharkey
Chief Engineering and Technology Policy, Federal Regulatory Affairs

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