



June 9, 2016

**VIA ELECTRONIC FILING**

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

Re: *Use of Spectrum Bands Above 24 GHz for Mobile Radio Services et al*, GN Docket No. 14-177; RM-11664; WT Docket No. 10-112; IB Docket No. 15-256; IB Docket No. 97-95.

Dear Ms. Dortch,

CTIA<sup>®</sup> and its member companies have provided extensive technical documentation as well as a compromise framework to manage spectrum sharing between terrestrial mobile broadband and Fixed-Satellite Service ("FSS") systems in the millimeter wave band spectrum. In particular, CTIA recently provided its suggested licensing framework that would allow both terrestrial and satellite licensees to deploy services while not elevating the allocation rights of any party.<sup>1</sup> Additionally, CTIA members AT&T Services Inc. ("AT&T"), Nokia ("Nokia"), Samsung Electronics America ("Samsung"), Ericsson ("Ericsson"), T-Mobile USA, Inc. ("T-Mobile"), and Verizon ("Verizon") have filed a series of technical filings, detailing interference modeling and simulations between terrestrial and satellite services in the millimeter wave band spectrum.<sup>2</sup> CTIA takes the opportunity to supplement these filings with additional

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<sup>1</sup> See *Ex Parte* Presentation of CTIA to Marlene H. Dortch, GN Docket No. 14-177, *et al*, at 1-3 (May 20, 2016).

<sup>2</sup> See Letter from AT&T, Nokia, Samsung, T-Mobile, and Verizon to Marlene H. Dortch, Secretary, Federal Communications Commission, GN Docket No. 14-177, *et al*, (May 6, 2016) ("Joint Filers May 6 Letter"). See also *Ex Parte* presentation of AT&T, Nokia, Samsung, T-Mobile, and Verizon to Marlene H. Dortch, Secretary, Federal Communications Commission, GN Docket No. 14-177, *et al*, (May 12, 2016) ("Joint Filers May 12 Letter"). See also Letter from AT&T, Ericsson, Nokia, Samsung, T-Mobile, and Verizon to Marlene H. Dortch, Secretary, Federal Communications Commission, GN Docket No. 14-177, *et al*, (June 1, 2016) ("Joint Filers June 1 Letter"). See also Letter from Ericsson to Marlene H. Dortch, Secretary, Federal Communications Commission, GN Docket No. 14-177, *et al*, (May 25, 2016).



details necessary for a successful licensing framework for spectrum sharing in the millimeter wave bands.

To give effect to this proposed framework and technical analysis, CTIA encourages the Commission to adopt the following additional critical components for establishing a successful spectrum sharing framework. First, any interference exclusion zone around FSS earth stations should be determined using the technical analysis/parameters provided by AT&T, Nokia, Samsung, T-Mobile, and Verizon in their filings to the Commission. The Commission should reject use of any static or beyond worst-case modeling suggested by the FSS industry as overly conservative and inconsistent with real-world effects. Second, prior to any new FSS earth station deployment in the millimeter wave bands, the new FSS entrant should coordinate with any affected terrestrial licensee (whether from prior auctions or the new auctions contemplated by the Commission). The terrestrial licensee should have a right of refusal of a new FSS system, so long as that refusal is based upon the technical analysis provided by the Joint Filers to the FCC and that its coordination efforts are made in good faith. In other words, the terrestrial licensee cannot simply reject a request by a new FSS entrant without a reasoned, technical basis. Finally, once a new FSS earth station has been coordinated with the affected terrestrial licensee, the application required to license the FSS system should be placed on public notice and subject to normal public comment prior to authorization by the Commission. This additional step will permit all terrestrial and satellite stakeholders an opportunity to understand and comment upon any new FSS uses of the millimeter wave spectrum prior to licensing.

CTIA believes that these supplemental efforts will enable both terrestrial and satellite services to make intensive use of the millimeter wave bands in a manner that fairly balances the rights of all affected stakeholders.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed in ECFS. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

*/s/ Scott K.  
Bergmann*

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Scott K. Bergmann  
Vice President, Regulatory Affairs  
CTIA