



August 20, 2004

**VIA ELECTRONIC COMMENT FILING SYSTEM**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re: EX PARTE Communication  
ET-Docket 00-258**

Dear Ms. Dortch:

On behalf of T-Mobile USA, Inc., we write to clarify T-Mobile's position with respect to the potential reallocation of 1915-1920 MHz paired with 1995-2000 MHz for the expansion of the PCS Band (*i.e.*, the "H Block"). In short, T-Mobile supports the creation of an H Block, but only on the condition that strict protections to safeguard incumbent PCS operations from the real possibility of degrading interference from H block operations are established, as CTIA has advocated.<sup>1</sup>

Notwithstanding the fact that T-Mobile is the newest of the national carriers, T-Mobile is experiencing the fastest rate of growth in subscribership among the national operators. With over 15.4 million subscribers as of June 30, 2004 (and 4 million subscribers added just in the previous twelve months), T-Mobile's recent rate of growth is both a validation of its value proposition for consumers and also a driver of considerable thought within the company as to how it can best continue to sustain its market leadership into the future. New sources of spectrum – particularly in the 1.9 GHz PCS range, the only spectrum band in which T-Mobile operates – will be vital to T-Mobile's ability to continue to compete in the market and provide existing voice and data services as well as new advanced services that consumers are increasingly demanding. Thus, T-Mobile supports the Commission's efforts to identify and allocate additional, suitable spectrum for CMRS operations in general and in the 1.9 GHz PCS range in particular.

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<sup>1</sup> See, e.g., Letter from Paul Garnett, CTIA – The Wireless Association, to Marlene Dortch, FCC (ET Docket No. 00-258) (August 18, 2004) (noting concerns with allocation of H Block unless adequate protections and safeguards are adopted by the Commission).

At the same, T-Mobile's status as an incumbent PCS operator means that it is especially attentive to the potential for interference to its existing operations. We consider the threat of interference to existing PCS operations to be of *great concern*.<sup>2</sup> Specifically, T-Mobile's concerns fall into three categories:

**1 - H Block Handset to A-F Block Handset Interference.** Without adequate protections H block handsets will, when in close physical proximity, desensitize existing PCS handsets (especially A Block handsets), which do not incorporate filtering adequate to discriminate against unwanted H Block in-band transmissions.

**2 - H Block Out of Band Emissions Limits.** Adherence to industry standards on out of band emissions limits for PCS handsets of -76 dBm/MHz is required of H Block devices in order to provide adequate protections to existing A-F Block handsets.

**3 - Interaction between H Block Mobiles and MSS/ATC Handsets.** Because MSS/ATC operations have yet to be fully launched, the precise parameters of the interactions between MSS/ATC handsets and H Block devices cannot be known at the present time. However, T-Mobile believes that widespread MSS/ATC operations, if they emerge in the market, would impair H Block operations. Further evaluation by the FCC is warranted.

T-Mobile supports and appreciates the Commission's intention to allocate additional spectrum and make it available to CMRS operators so that consumers can receive even better wireless services in the future. However, such decisions cannot be made in a vacuum, and the Commission must be mindful of the potential for harmful interference and service disruptions to tens of millions of CMRS customers that could result from a decision to establish an H block without the necessary protections.

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<sup>2</sup> To the extent parties have downplayed the probability and significance of the interference threats, T-Mobile specifically disagrees with that assessment. *See, e.g.*, Letter from Trey Hanbury, Nextel Communications, to Marlene Dortch, FCC (ET Docket No. 00-258) (August 12, 2004) (reiterating previously articulated position that licensees can use H Block today with creating harmful interference for incumbents). Conversely, to the extent parties may argue that such interference concerns are insoluble (and therefore that spectrum should not be allocated for CMRS services), T-Mobile would similarly disagree with such an assessment. In our view, the interference concerns described above are significant and must be adequately addressed, but they should be addressable by appropriate Commission action.

Pursuant to section 1.1206(b) of the Commission's rules, an electronic copy of this letter is being filed. Please do not hesitate to contact the undersigned should you have any questions.

Sincerely,

  
Thomas J. Sugrue  
Vice President, Government Affairs

**Robert A. Calaff**  
Director, Federal Policy

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