

September 2, 2004

BY ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
The Portals  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: ET Docket No. 00-258  
*Ex Parte Presentation*

Dear Ms. Dortch:

Nextel submits this letter in response to a “study” from Sprint that purports to show that certain unidentified CDMA handsets will experience interference in the presence of an H Block signal. Sprint’s submission is devoid of meaningful, reliable information; therefore, it should be accorded no weight.

Sprint’s study includes a number of assumptions that do not accord with established engineering principles and industry rules. On out-of-band-emissions, for example, Sprint manufactures interference where none would exist. Sprint uses power levels in a fictional H Block handset that far exceed the maximum power levels for human exposure to radio frequency (RF) radiation permitted by the Commission’s specific absorption rate (SAR) rules.<sup>1</sup> In the United States, all handheld CDMA devices operate at a maximum transmit power of 24 dBm.<sup>2</sup> The Commission has concluded that permitting anything more powerful in a mobile handset could expose the public to harmful RF radiation. Sprint ignores the effective 24 dBm limit on mobile handset transmitter power and instead assumes that H-Block mobile handsets will transmit at up to 48 dBm – or more than one-hundred-and-fifty times the power of today’s CDMA handsets. At these power levels, Sprint effectively assumes that a mobile handset is as powerful as a base station.<sup>3</sup>

Sprint’s filing actually supports establishing the H Block. Sprint, for example, claims that H Block handsets have significant RF overload interference issues. As demonstrated below, RF overload interference occurs when the receive filter (shown in blue in the diagram) hears a signal from an undesired

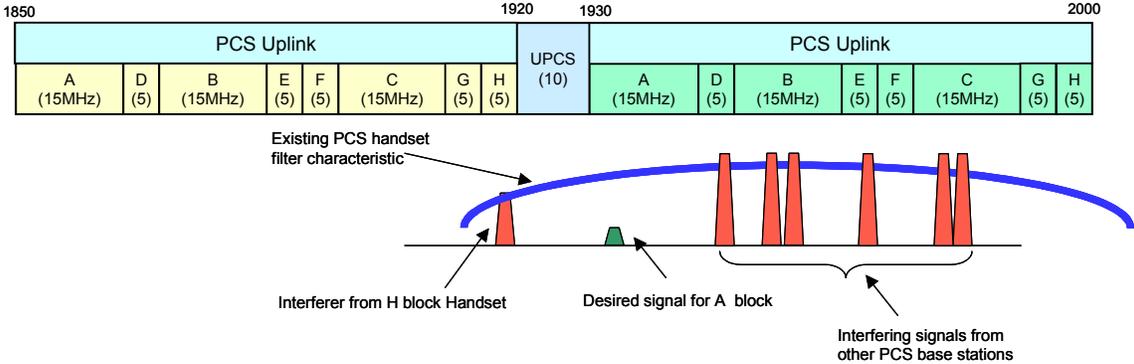
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<sup>1</sup> *Sprint Ex Parte* Filing at 6.

<sup>2</sup> The industry commonly refers to this value as the “minimum of the maximum” power. While power levels of up to 2 watts are permitted in mobile handsets under Commission rules, the SAR rules governing human exposure to RF radiation effectively limit CDMA mobile transmitter power to no more than 23 or 24 dBm.

<sup>3</sup> A typical iDEN base station, for example, transmits at 49 dBm EIRP.

transmitter. This signal could be coming from H block handsets or other PCS base stations. RF interference contribution from H block handsets, if any, is far less than from other undesired base station signals that are much more powerful – even taking into account the greater distance between the user and the transmitter. Since the higher power base stations do not cause interference to existing PCS users today, Sprint’s argument provides no rational support for its assertions.



Thus, the limited information Sprint has presented on the record actually supports – rather than contradicts – establishing an H Block allocation.

Consistent with section 1.1206(b)(2) of the Commission’s rules, 47 C.F.R. § 1.1206(b)(2), please include this letter in ET Docket No. 00-258.

Sincerely,

*Lawrence R. Krevor*

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