



November 8, 2006

EX PARTE NOTICE

Electronic Filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, D.C. 20554

Re: WT Docket No. 02-55
ET Docket No. 00-258
ET Docket No. 95-18

Dear Ms. Dortch:

T-Mobile USA, Inc. (“T-Mobile”) files this *ex parte* letter in response to several filings made by Sprint Nextel Corporation (“Sprint”) in the above referenced dockets in order to address important and complex interference issues between Advanced Wireless Service (“AWS”) and Broadcast Auxiliary Services (“BAS”). Although AWS service and interference rules were made final in November 2003, T-Mobile is now experiencing real-time the complex environment in which it must operate to provide Third Generation services in the AWS band.

Since receiving its AWS licenses in November 2006, T-Mobile has worked cooperatively with all incumbents, including broadcasters, to obtain prompt access to AWS spectrum. T-Mobile is one of 96 “A block” licensees who bid approximately \$2.2 billion to operate in the 2110-2120 MHz portion of the AWS band. During preliminary field-testing of AWS equipment, T-Mobile and AWS equipment vendors discovered interference challenges between A block and adjacent-channel BAS operations.¹ Since then, T-Mobile has been working in good faith to better understand the operating environment for both AWS and BAS licensees.² T-Mobile has also kept Sprint informed of its efforts so

¹ T-Mobile’s preliminary tests show the potential for (1) adjacent-channel interference between T-Mobile base-station transmitters and BAS receive-only sites, and (2) adjacent-channel interference between BAS transmitters and T-Mobile handsets.

² T-Mobile conducted limited field-testing with station WLS in Chicago in April and May 2007. In addition, T-Mobile is working with the Society of Broadcast Engineers (“SBE”) and the Association for Maximum Service Television, Inc., (“MSTV”) to develop a test plan to define the radio environment, establish interference pass/fail criteria, and mitigate harmful interference for AWS and BAS operations.

Ms. Marlene H. Dortch

November 8, 2007

Page 2 of 2

that Sprint may incorporate the appropriate technical solutions in accordance with its obligations to BAS licensees under the Commission's 800 MHz Rebanding Order.

For the record, T-Mobile believes Sprint's characterization of T-Mobile's AWS deployment and description of the potential interference problem needs clarification.³ We are committed to working with all interested parties to develop a fair and reasonable solution that mitigates harmful interference in this band. T-Mobile is sensitive to the fact that the change-out of BAS equipment currently underway is extraordinarily complicated. Timing is critical for all parties. But it makes no sense to implement this process only to find out that the new digital equipment must be retrofitted to resolve interference problems that were ignored for the sake of expediency. Such a result serves no one, least of all the broadcasters who could potentially have their electronic newsgathering operations further disrupted.

Accordingly, T-Mobile asks the Commission to ensure that T-Mobile and other AWS A block licensees are included in the "acceleration summit" recently proposed by Sprint⁴ and provided for in the Commission's November 6, 2007 Order.⁵ We will continue to do our part and work with BAS incumbents and Sprint toward a viable solution.

Sincerely,

/s/ Kathleen O'Brien Ham

Managing Director, Federal Regulatory Affairs
T-Mobile USA, Inc.

³ In its October 17, 2007 *ex parte* presentation, Sprint speculates that the only interference problem is "brute force overload" caused by T-Mobile's "high-powered" AWS base stations located at high sites near BAS receivers. T-Mobile is unaware of any AWS to BAS interference testing that Sprint has performed that supports this assertion. Brute force overload, or front end overload, results from a BAS receiver's front end accepting excessive radio frequency energy because of ineffective filtering coupled with unnecessary signal amplification. Without testing the various BAS filters and low noise amplifiers with AWS transmitters, it is impossible to conclude that brute force overload interference will occur to digital BAS.

⁴ Sprint Nextel Corporation *Ex Parte*, in WT Docket No. 02-55, ET Docket No. 00-258, and ET Docket No. 95-18 (Oct. 30, 2007).

⁵ See *Improving Public Safety Communications in the 800 MHz Band*, WT Docket No. 02-55, ET Docket No. 00-258, ET Docket No. 95-18, Order (rel. Nov. 6, 2007).