

June 17, 2008

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

Re: *Ex Parte* Submission in WT Docket Nos. 04-356, 07-195

Dear Ms. Dortch:

On Monday, June 16, 2008, Christopher Guttman-McCabe, Vice President, Regulatory Affairs, and Paul Garnett, Assistant Vice President, Regulatory Affairs, CTIA-The Wireless Association®, met with Renée Crittendon, Legal Advisor to Commissioner Jonathan Adelstein to discuss the FCC's proposed service and technical rules for the AWS-2 bands (one paired block comprising 1915-1920 MHz and 1995-2000 MHz (the "H block") and one paired block comprising 2020-2025 MHz and 2175-2180 MHz (the "J block")) and the AWS-3 band (2155-2175 MHz). CTIA explained the importance of technical rules for these spectrum blocks that adequately protect millions of customers utilizing adjacent spectrum blocks from harmful interference. Prior handset and filter testing demonstrates that, without protective technical rules, millions of American consumers will experience lost calls, distorted audio, inability to make and/or receive calls, inability to determine location (E-911), and lower data rates.¹ In order to minimize the likelihood of these events from occurring, parties previously have supported at least 10 MHz of separation between mobile transmission and mobile receive, as well as power constraints on mobile transmissions.² CTIA also urged the Commission to adopt out-of-band emission limits consistent with established industry standards. Such protections are particularly important in light of efforts by wireless carriers to utilize existing and recently acquired spectrum to deploy next generation wireless broadband services.

CTIA also expressed its concern that, as the Commission works to complete the service rules for spectrum in the AWS-3 band, certain proposals could skew an auction to the benefit of one entity or business model. CTIA stressed the need for continued fair, open auctions with flexible service rules, rather than tailored conditions that may favor certain

¹ See, e.g., Comments of CTIA – The Wireless Association, WT Docket No. 04-356 (filed Dec. 8, 2004); see also Comments of Motorola, WT Docket No. 07-195 (filed Dec. 14, 2007); Reply Comments of Ericsson, WT Docket No. 07-195 (filed Jan. 14, 2008).

² See, e.g., Joint Comments of Sprint Corporation and Verizon Wireless, WT Docket No. 04-356 (filed Dec. 8, 2004).

parties over others. Pursuant to Section 1.1206 of the Commission's Rules, this letter is being electronically filed with your office. If you have any questions regarding this submission, please contact the undersigned.

Sincerely,

/s/ Paul W. Garnett

Paul W. Garnett

cc: Renée Crittendon