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July 30, 2008 57739-000020

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

Re: Service Rules for Advanced Wireless Services in the 2155-2175 MHz Band (WT Docket No. 07-195) (AWS-3); Service Rules for Advanced Wireless Services in the 1915-1920 MHz, 1995-2000 MHz, 2020-2025 MHz and 2175-2180 MHz Bands (WT Docket No. 04-356)(AWS-2)

Dear Ms. Dortch:

On July 30, 2008, Mark A. Stachiw of MetroPCS Communications, Inc. ("MetroPCS"), along with Carl W. Northrop and Michael Lazarus of Paul, Hastings, Janofsky & Walker LLP ("Paul Hastings"), participated in a telephone conference call with Ira Keltz, Patrick Forster, and Ahmed Lahjouji of the FCC's Office of Engineering and Technology. The oral presentation in this conference call was consistent with the pleadings and *ex partes* filed on behalf of MetroPCS in the above-referenced proceedings in which it advocates Commission-sponsored testing to address potential interference concerns raised by the latest AWS-3 and AWS-2 allocation proposals. MetroPCS also discussed the attached handout which outlines the interference testing procedures suggested by MetroPCS. Copies of this attachment were emailed to the participants prior to the conference call.

MetroPCS also indicated during this conference call that (1) in the view of MetroPCS, appropriate testing could be conducted in a relatively short time frame and need not unreasonably delay the Commission's final allocation decision; (2) the value of testing will be enhanced if the Commission tests currently available AWS-1 and PCS and prototype AWS-1 handsets to examine the extent to which AWS-3 and AWS-2 operations at varying parameters cause interference to incumbent operations in the AWS-1 and PCS bands; (3) testing will be most efficacious if it is set at a time and place that will encourage broad industry participation (including representatives of M2Z, incumbent wireless carriers, equipment manufacturers and other industry groups); and (4) MetroPCS personnel would be willing to participate in the testing under these circumstances.

Kindly refer any questions in connection with this letter to the undersigned.

Respectfully submitted,

Michael Lazarus
of PAUL, HASTINGS, JANOFSKY & WALKER LLP

cc: (via email) Julius Knapp
Ira Keltz
Patrick Forster
Ahmed Lahjouji

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Interference Tests

AWS-3 to AWS-1

AWS-2 to PCS

July 29, 2008

Receiver Overload (1/2)

- Goal: To measure performance degradation of the victim receiving handset when it is placed in close proximity of the transmitting interfering handset. Performance degradation to be measured via increase in Frame Error Rate (FER) or Bit Error Rate (BER), and also through measurement of the interfering power level that results in a call drop for victim handset
- Test conditions:
  - Victim handset is placed at distances of 1, 3, and 5 m from the interfering handset
  - Interfering handset is operating at 0 to 23 dBm/MHz transmit power in increments of 8 dBm
  - Victim handset is operating in marginal radio conditions (-95 to -105 dBm receive power in 5 dB increments for CDMA victims and -92 dBm to –102 dBm in 5 dB increments for GSM victims)
  - Victim and interfering handsets are listed in Table 1

Receiver Overload (2/2)

- Test Configuration
  - Victim and interfering handsets are held in upright position
  - Controlled environment so that tests are repeatable within acceptable margin
- Test Results
  - Graphs of interfering power level versus victim handsets FER or BER (whichever applicable) in the range of 0-20% for all handset combinations in Table 1
  - Interfering power level that results in a call drop for each victim handset model in Table 1

Table 1

Handsets by technology (with AWS1 band support)

	3GPP2					3GPP					IEEE 802.16
	1xRTT	DOr0	DOrA	DOrB	DOrC (UMB)	GSM	GPRS	EDGE	UMTS/WCDMA	LTE	WiMAX
Nokia	**1606, 3606**	**8106**	**8106**	NA	NA				NA	NA	NA
Samsung	**R210, R450**	**R550**		NA	NA					NA	NA
LGE	NA	NA	NA	NA	NA					NA	NA
Motorola	**V3s**	NA	NA	NA	NA					NA	NA
Sanyo	NA	NA	NA	NA	NA					NA	NA
Sony/Ericsson	NA	NA	NA	NA	NA					NA	NA
Kyocera	**S4000**	NA	NA	NA	NA					NA	NA
Apple(iPhone)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
RIM (Blackberry)	NA	NA	NA	NA	NA					NA	NA
UTStarcom	**7126**	NA	NA	NA	NA					NA	NA

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OOBE

- Goal: To measure the performance degradation of the victim handset due to out of band emissions of interfering terminal that fall in the receive band of the victim handset
- Use Additive White Gaussian Noise (AWGN) signal to represent the OOBE of the interfering handset
- Radiate AWGN signal from equivalent handset and measure victim handset's performance degradation following similar test conditions and test configurations as that of the blocking tests.
- Test results in this case would include graphs of AWGN signal level versus FER or BER and tabulated data of AWGN signal level that results in a call drop for all handset models in Table 1.

Intermodulation Distortion (IMD)

- Goal: To measure the performance degradation of PCS receiver due to H-Block and PCS transmissions
- Transmit H-Block frequency such as 1918.75 MHz from equivalent handset and transmit an appropriate PCS channel like channel 575 or 1878.75 MHz from a victim PCS handset and measure performance degradation of the victim PCS handset receiving on PCS channel like 1958.75 MHz (2x1918.75 – 1878.75 = 1958.75)
- Test results would be graphs of H-block power level versus PCS handset's FER/BER of the handsets in Table 2

Table 2

Handsets by technology (with PCS band support)

	3GPP2					3GPP					IEEE 802.16
	1xRTT	DOr0	DOrA	DOrB	DOrC (UMB)	GSM	GPRS	EDGE	UMTS/WCDMA	LTE	WiMAX
Nokia	**1606, 3606**	NA	**8106**	NA	NA	**N95**			NA	NA	NA
Samsung	**R210, R450**	**R550**	**Instinct(Sprint)**	NA	NA					NA	NA
LGE		**VX8560(VzW)**	**Dare(Verizon)**	NA	NA					NA	NA
Motorola	**V3s**	**Z6m**	NA	NA	NA					NA	NA
Sanyo				NA	NA					NA	NA
Sony/Ericsson	NA			NA	NA					NA	NA
Kyocera	**S4000**	**KPC650(data card)**	**KPC680(data card)**	NA	NA					NA	NA
Apple(iPhone)	NA	NA		NA	NA	NA	NA	iPhone(orig)	iPhone 3G	NA	NA
RIM (Blackberry)	NA	**8700(VzW)**		NA	NA					NA	NA
UTStarcom	**7126**			NA	NA					NA	NA

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