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October 3, 2008

Notice of *Ex Parte* Communication

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W. Room TW-A325
Washington, DC 20554

Re: *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*

Dear Ms. Dortch:

On behalf of Sprint Nextel Corporation, Richard B. Engelman, Lawrence R. Krevor, and I met yesterday with Julius Knapp, Patrick Forster, and Bruce Romano of the Commission's Office of Engineering and Technology. During the meeting, we discussed the attached presentation regarding H Block service rules and how intermodulation interference distinguishes the H Block from other spectrum bands, such as the AWS-3 band. As documented in the presentation, intermodulation interference is not present in the AWS-3 band. In the H Block, however, intermodulation is present and intermodulation interference occurs at a much lower power than either out-of-band emissions ("OOBE") or receiver overload interference does. Consequently, the distances and corresponding probability within which mobile-to-mobile intermodulation interference will occur are substantially greater than the distances and probability within which OOBE or receiver overload interference will occur.

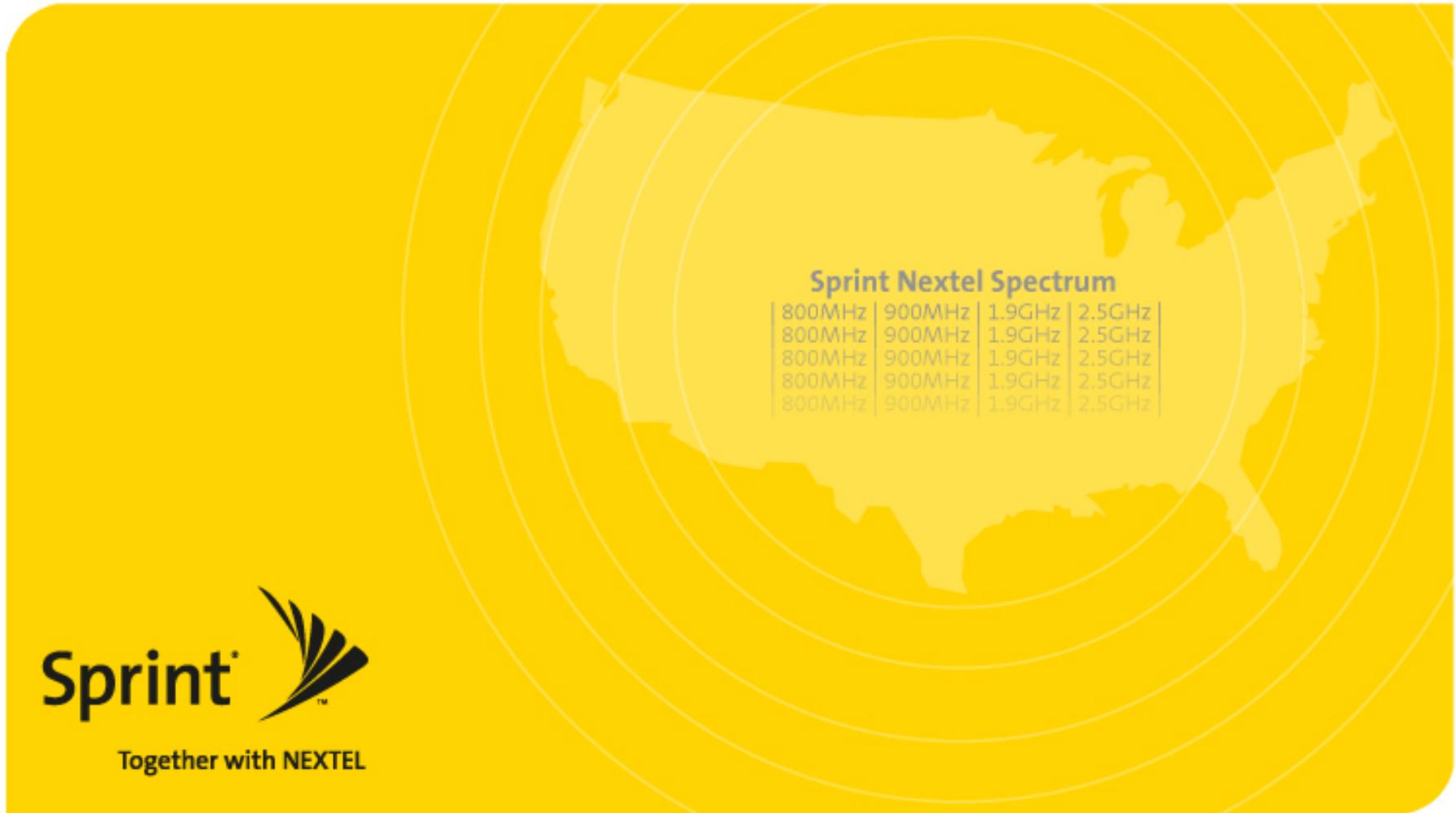
We also reiterated Sprint Nextel's position that the Commission should adopt a bifurcated handset power limit (6 dBm EIRP for the 1917-1920 MHz band and 30 dBm EIRP for the 1915-1917 MHz band) to avoid harmful interference to PCS B Block operations and to permit flexibility where interference is unlikely. We expressed Sprint Nextel's support for an OOBE limit for H Block mobile emissions falling into the PCS 1930-1990 MHz band, which reflects industry standards. Finally, we advocated that, while reasonable limits on operations are needed to prevent interference, the Commission should not take the unwarranted and empirically baseless approach of prohibiting the deployment of mobile services in the H Block.

Pursuant to Section 1.1206 of the Commission's rules, this letter is being filed via ECFS with your office.

Sincerely,

Trey Hanbury, Esq.
Director, Sprint Nextel Corporation

cc: Julius Knapp, Patrick Forster, Bruce Romano



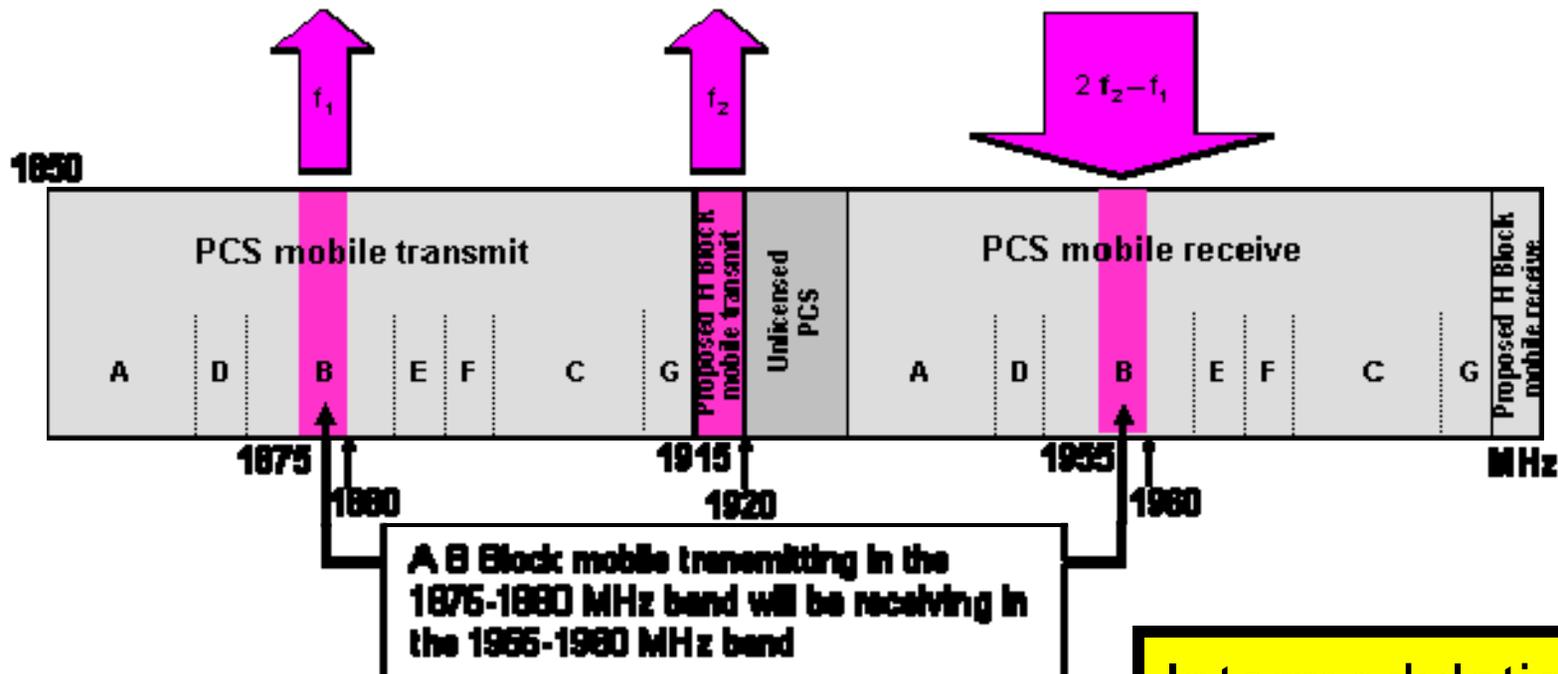
H-Block Service Rules

October 2, 2008

H-Block Differs from AWS-3 due to Intermodulation Interference

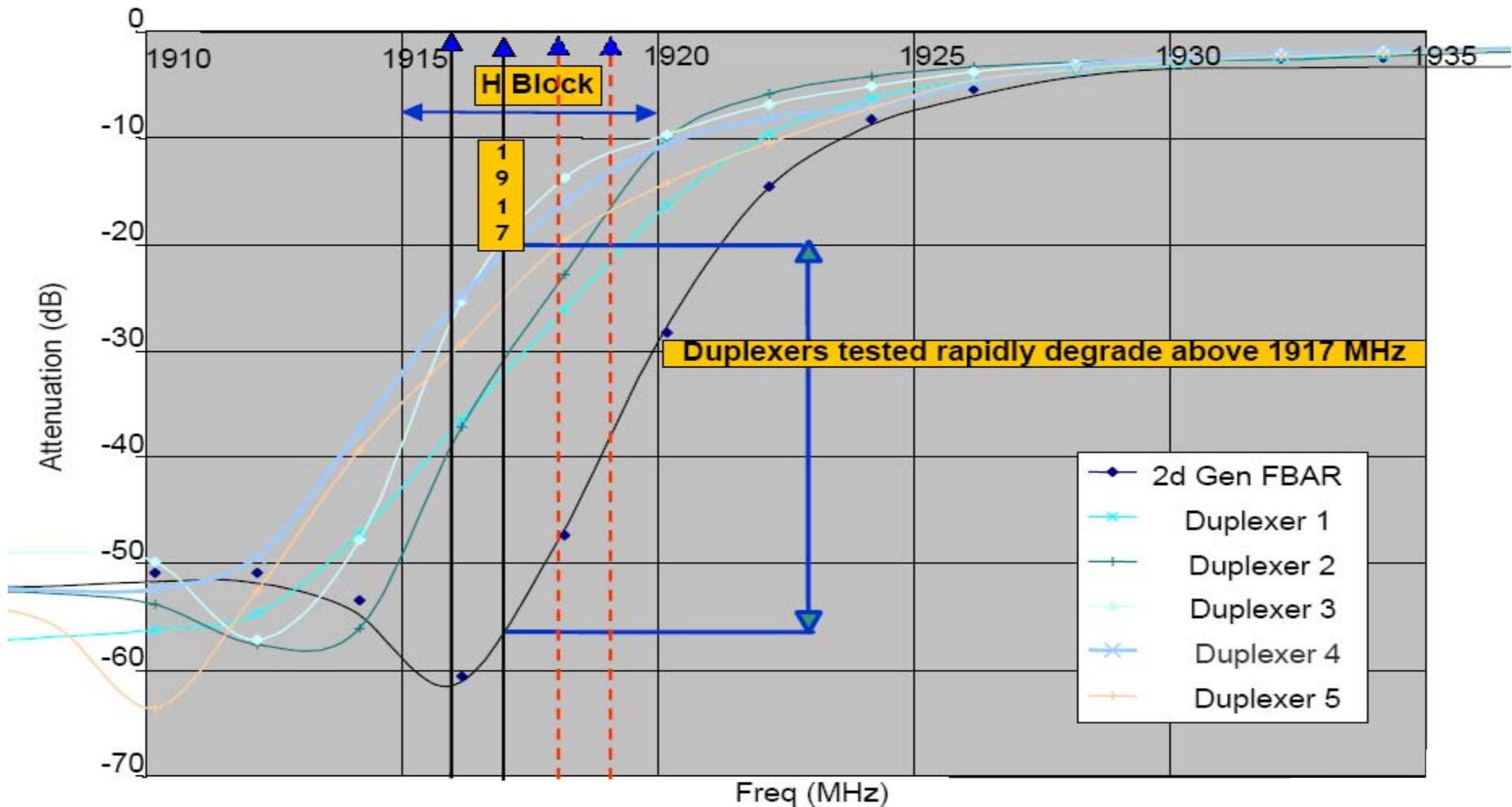


Sprint Nextel Spectrum



Intermodulation interference is the key issue in the H Block proceeding

Duplexer Measurements Show Inflection Point above 1917 MHz



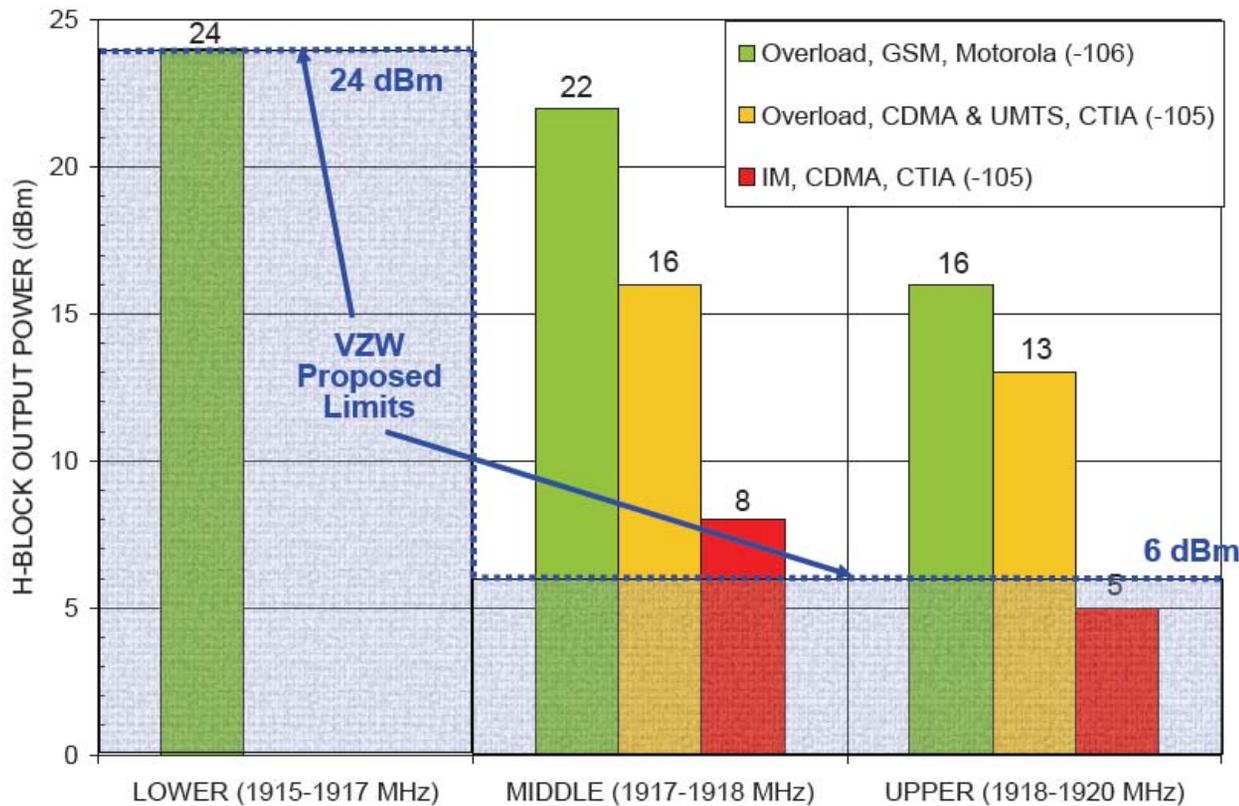
3 Source: Sprint Nextel *Ex Parte*, September 13, 2005

Sprint Nextel and Verizon Wireless Agree Intermodulation is Significant



Sprint Nextel Spectrum

VZW Proposed Power Limits for H-Block



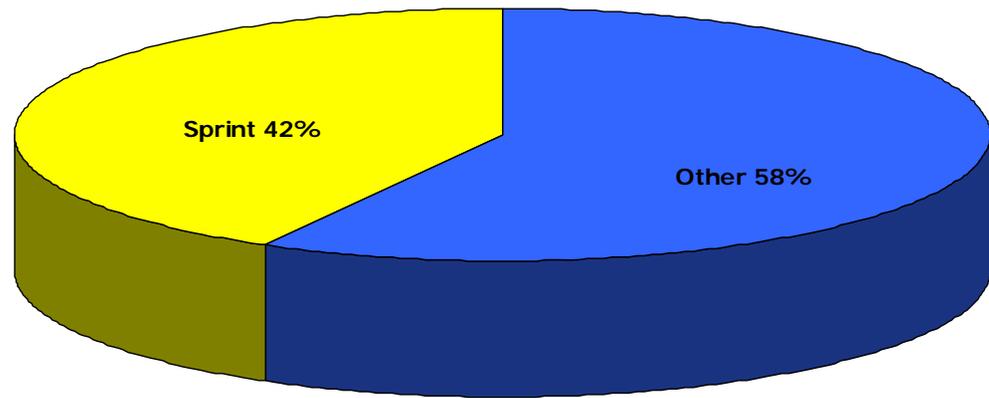
Intermodulation Interference Will Occur At 8-14 dB Lower Power Levels Than Receiver Overload

Intermodulation Poses No Issue for GSM Carriers, but Major Threat to CDMA Carriers



- Measured by BTA, Sprint Nextel holds nearly half of all B Block licenses – the only block vulnerable to IM interference from H Block
- As a percentage of coverage, 42% of Sprint services occur using B Block licenses
- Sprint's B Block licenses are also concentrated in some of the nation's most densely populated areas, where IM is most likely to occur

Percentage of BTA Coverage - B Block

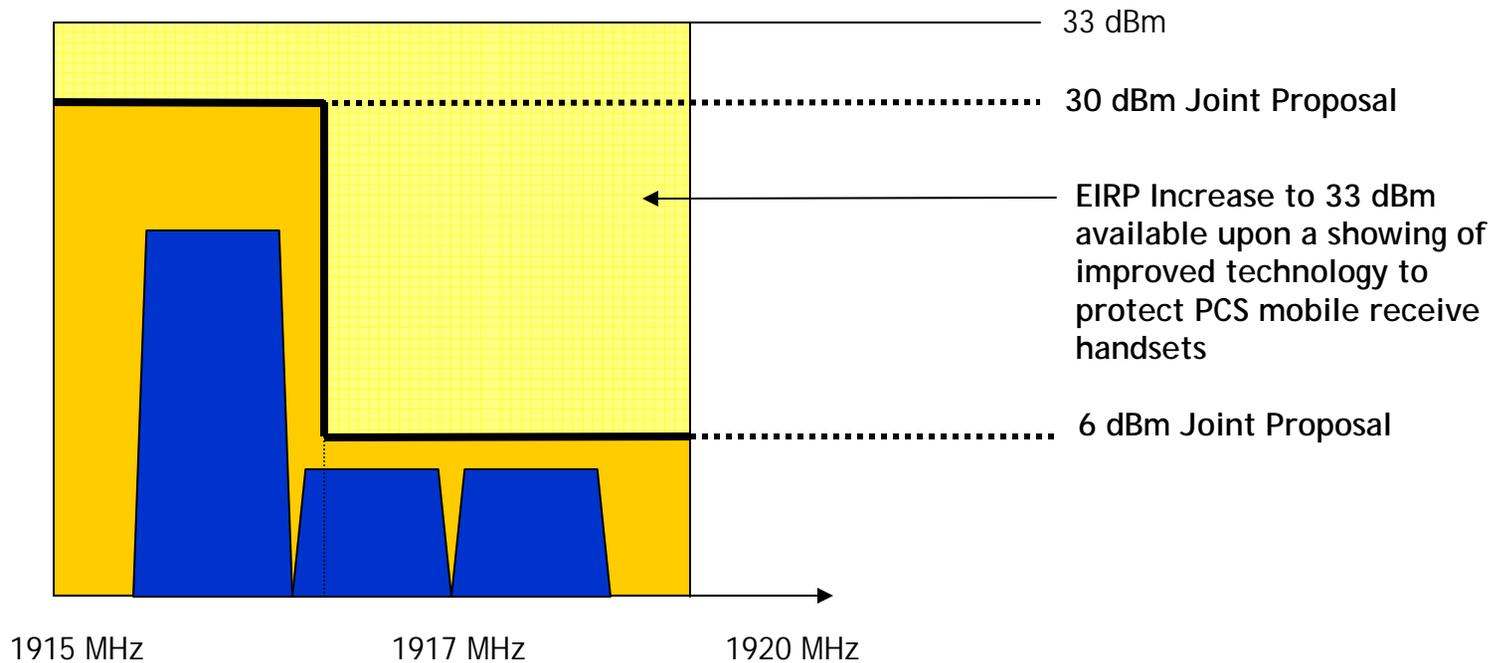


Source: Sprint Nextel *Ex Parte*, September 13, 2005

Solution: Intermodulation and Overload



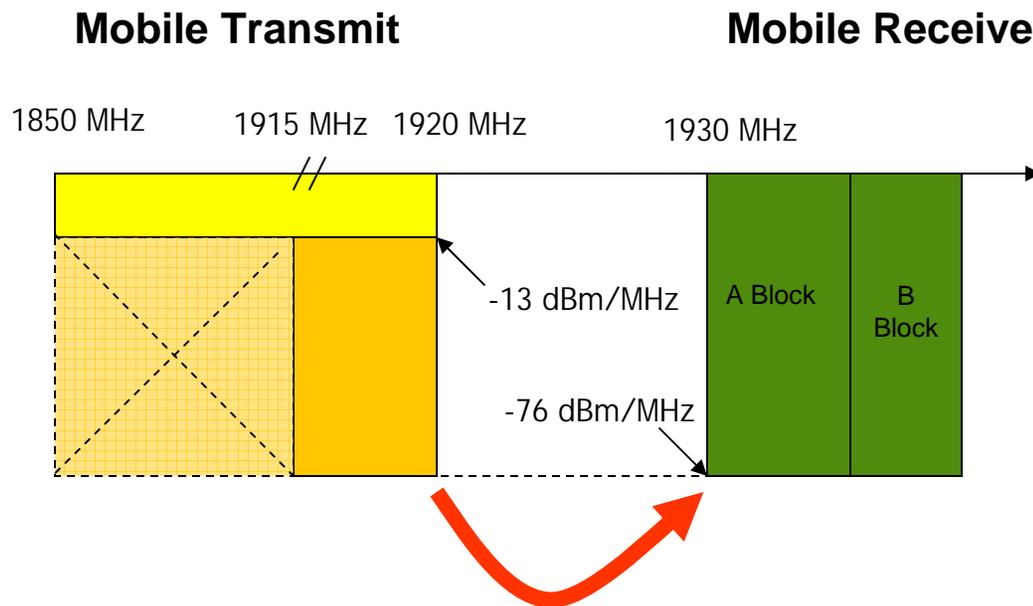
- The February 8, 2005 Sprint-Nextel-Verizon Wireless joint proposal
- > Made EIRP limits context sensitive to prevent receiver overload and intermodulation into the mobile receive bands, particularly B Block
 - > Provided a mechanism for future EIRP increases



Solution: Out-of-Band Emissions



Sprint Nextel Spectrum



- Because most PCS operations are substantially more protective than the minimum OOB standard for PCS, Sprint-Nextel-Verizon Wireless originally proposed to incorporate industry-standard -76 dBm/MHz and apply to this limit to all new mobile transmit PCS Blocks A-H to avoid harmful emissions into A Block
- Emissions from PCS Blocks A-G are not relevant to OOB from H Block; therefore, the -76 dBm/MHz limit need only apply to the H Block