

August 6, 2009

Via Electronic Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: **EX PARTE**
GN Docket No. 09-51; WT Docket No. 06-150; PS Docket No. 06-229; WT Docket
No. 05-265; WT Docket No. 00-193; WC Docket No. 05-25

Dear Ms. Dortch:

On August 5, 2009, Tom Sugrue and Kathleen O'Brien Ham of T-Mobile USA, Inc. ("T-Mobile") met with Blair Levin from the Commission's Office of Strategic Planning and Policy Analysis regarding the above-referenced dockets. The T-Mobile representatives specifically discussed the need for additional commercial spectrum to meet increasing consumer demand for mobile broadband services. The T-Mobile representatives expressed views that were consistent with the comments and other filings that it has submitted in the above-referenced proceedings. The T-Mobile representatives also relied on the attached presentation.

Pursuant to Section 1.1206(b) of the Commission's rules, an electronic copy of this letter is being filed with the office of the Secretary. If you have any questions regarding this notification, please contact the undersigned.

Very truly yours,

/s/ Kathleen O'Brien Ham

Kathleen O'Brien Ham
Vice President, Federal Regulatory Affairs

Attachment

cc: Blair Levin

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National Broadband Plan: Addressing the Coming Spectrum Crunch

August 4, 2009



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Agenda

- T-Mobile's Mobile Broadband Network
- Exponential Growth in Wireless Data Use
- More Commercial Spectrum Is Essential
- Conclusion

T-Mobile's Mobile Broadband Network



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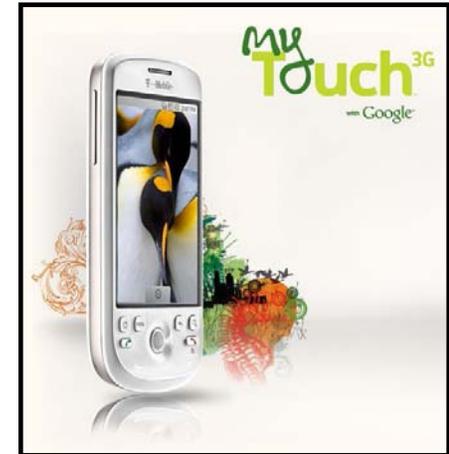
Aggressive Deployment

- Investment
 - \$4.2 Billion in AWS Licenses
 - \$4.8 Billion in Infrastructure Deployment
- Current Coverage
 - 130 Million Population
 - 141 Cities
- Coverage by end of 2009
 - 200 Million Population
 - 250 Cities



Evolving Network & Innovative Devices

- HSPA
 - 3G network speed ranked 2nd by **WIRED**
 - Speeds up to 14.4 Mbps* in 2010
- Android-based smart phones
 - 3 more in 2009
- Other innovative products & services
 - Data cards
 - Netbooks
 - T-Mobile Creation Center



*Based on availability of cost-effective backhaul

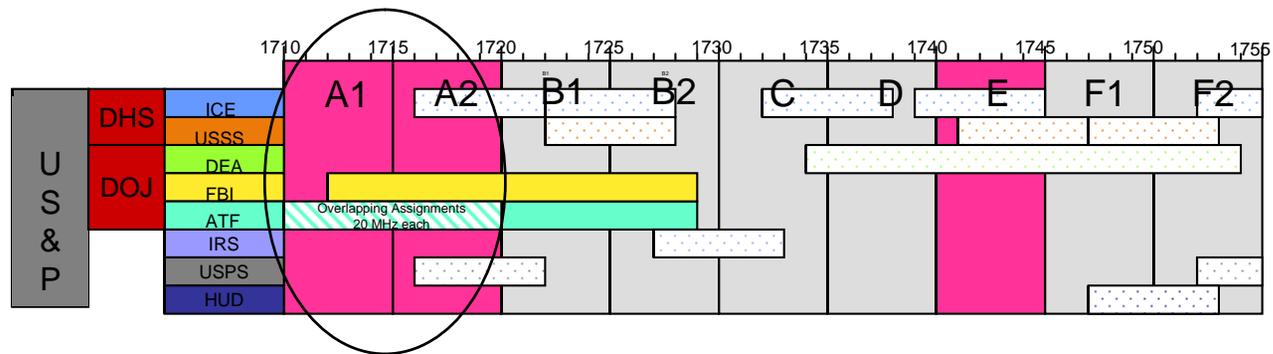
AWS Relocation – Federal Incumbents

12 Federal Agencies and over 1700 Frequency Assignments



Spectrum Clearing Challenges Remain

- New York Metro area
- FBI US&P Assignments
- Looking to activate second carrier currently encumbered by FBI



- ✓ 10 MHz A Block - 1700 MHz Spectrum Blocked
- ✓ 10 MHz A Block - 2100 MHz Paired Spectrum Blocked

 = Federal incumbent systems relocated to different frequency

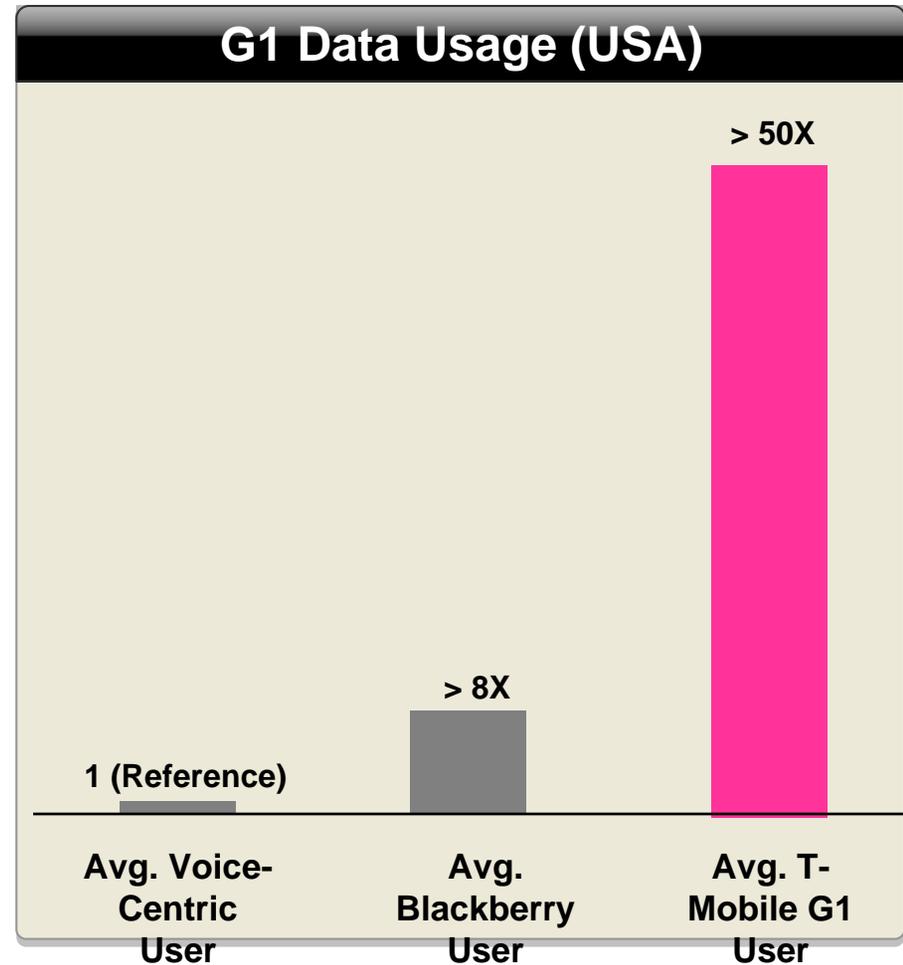
Exponential Growth in Wireless Data Use



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Demand for Bandwidth Has Exploded

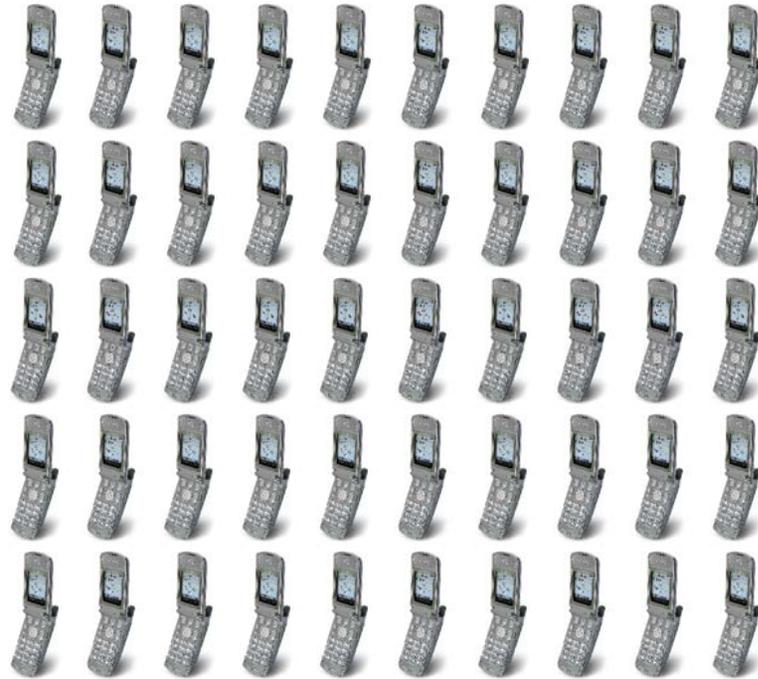
T-Mobile G1 customers use 50 times the data of the average T-Mobile customer



... And Will Only Accelerate



=



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 **x 450***

*Source: Cisco Visual Networking Index, Global Mobile Data Traffic Forecast Update (Jan 29, 2009)

More Commercial Spectrum Is Essential



Clear Need for More Commercial Spectrum

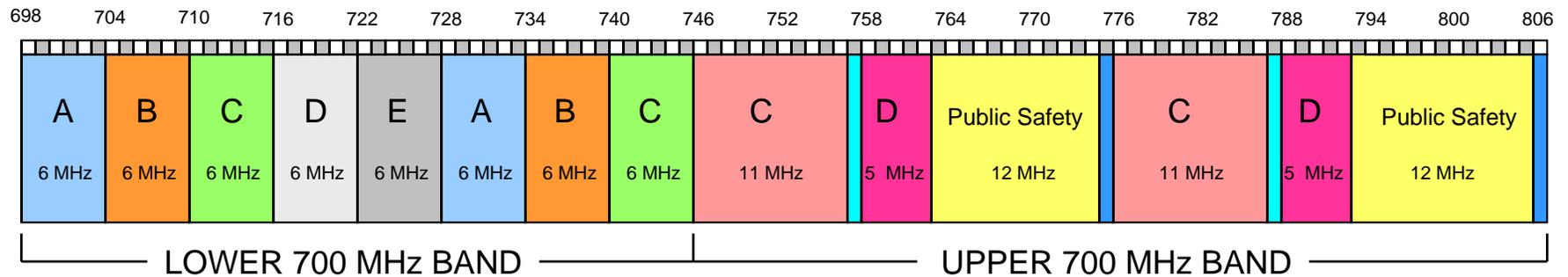
- Penetration rate for CMRS in U.S. is approximately 90%
- Consumers demand bandwidth-intensive services and applications
- Greater throughput requires larger channel assignments
- As bandwidth increases new applications are developed that make use of it

Other Countries' Spectrum Initiatives

- UK plans to allocate 400 MHz of additional commercial mobile spectrum
- Germany has identified 340 MHz of spectrum for wireless network access
- France is adding 72 MHz to its existing commercial mobile spectrum
- Italy and Belgium have announced plans to sell or auction 3G spectrum
- Mexico is intending to initiate a tender of 120 MHz of broadband spectrum

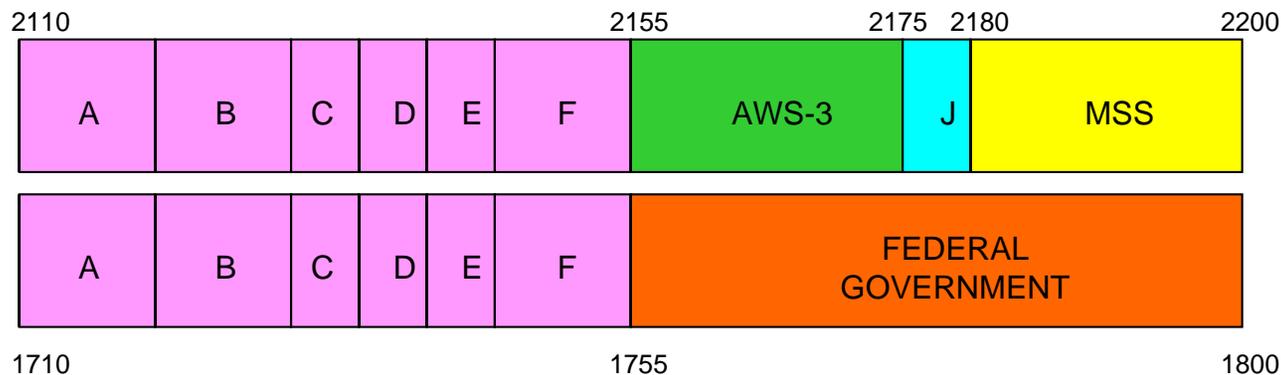
700 MHz D Block

- D Block currently allocated for commercial use
- AT&T, Verizon, and several public safety groups propose reallocating D Block to public safety
- FCC should auction D Block for commercial use



Spectrum Opportunities

- Spectrum inventory good start
- T-Mobile proposes allocating another 200 MHz for licensed commercial spectrum – 100 MHz from NTIA & 100 MHz from FCC
- Down payment: 1755 MHz + Band
 - Very valuable spectrum immediately adjacent to AWS-1



Other Broadband-related Issues

- Roaming
- Special Access
- Support for Legislation
 - Radio Spectrum Inventory Bill - S. 649
 - The Spectrum Relocation Improvement Act of 2009 - HR. 3019

Conclusion



4 Recommendations

1. Push relocation of federal incumbents in AWS-1 band
2. Maintain D Block for commercial use
3. Support targeted spectrum inventory
4. Consider identifying 200 MHz from FCC and NTIA of under utilized spectrum for licensed commercial use

Thank you!



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