



February 5, 2010

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. 04-356, 05-256, 06-150, 07-195, and 09-66
PS Docket No. 06-229,
GN Docket Nos. 09-47, 09-51, 09-137, and 09-157
WC Docket No. 05-25

Dear Ms. Dortch:

On February 4, 2010, Tom Sugrue and the undersigned of T-Mobile USA, Inc. (“T-Mobile”), met with Ruth Milkman, Jim Schlichting, John Leibovitz, Nese Guendelsberger, Margie Wiener, Joel Taubenblatt, Martha Stancill, and Paul D'Ari of the Wireless Telecommunications Bureau, and David Furth of the Public Safety & Homeland Security Bureau to discuss 700 MHz D Block, consistent with the attached presentation, as well T-Mobile’s views on the record on subjects covered in the above-referenced dockets.

Pursuant to section 1.1206(b) of the Commission’s rules, an electronic copy of this letter is being filed.

Ms. Marlene H. Dortch

February 5, 2010

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Sincerely,

/s/ Kathleen O'Brien Ham

Kathleen O'Brien Ham
Vice President,
Federal Regulatory Affairs

cc: Ruth Milkman,
Jim Schlichting
John Leibovitz
Nese Guendelsberger
Margie Wiener
Joel Taubenblatt
Martha Stancill
Paul D'Ari
David Furth



D Block Appeal to T-Mobile

- T-Mobile currently has no lower band spectrum
- 700 MHz and 850 MHz bands are dominated by the “Big 2”
- 700 MHz spectrum would enable:
 - Improved suburban in-home coverage
 - Extended outdoor footprint
 - Entry into underserved rural areas
 - Leveraged development of a 700 MHz ecosystem
 - Key plank in transition to LTE

D Block

- Framework

1. Auction for commercial use
2. Support legislation directing auction proceeds toward funding development of nationwide, interoperable broadband public safety network
3. D Block licensee(s) must deploy devices that tune across the 700 MHz band
4. The build-out requirements same as Upper 700 MHz – population-based, with signal coverage to at least 40% of the population within 4 years and at least 75% of the population within 10 years of the license term
5. D Block licensee(s) and PS to work together to develop and implement interoperability standards

- Options

1. To insure interoperability, may be necessary to impose technology standard on D Block (i.e., LTE) – T-Mobile would do LTE
2. To ensure that at least one carrier offers Priority Access, may be necessary to impose requirement on D Block
3. Nationwide license for D Block preferred, but licenses based on smaller areas (e.g., REAGs, MEAs, the 55 public safety regional planning committee areas) also acceptable. In the latter case, combinatorial bidding would improve the efficiency and equity of the auction

Public/Private Partnership for Public Safety Broadband Access

- Framework
 1. Provide PS with multiple options and partners to develop a nationwide wireless broadband network, while ensuring the commercial viability of the D block. PS could:
 - Build out a PS network using its existing 10 MHz of broadband spectrum
 - Lease some or all of its 10 MHz to a commercial operator in return for access to commercial networks
 - Share networks with commercial operators in 700 MHz band
 2. PPP not limited to D Block licensee(s)
 3. PS agencies allowed to use new or existing grant programs for funds
 4. PS could work with commercial providers to develop and implement interoperability standards
 5. PS could negotiate priority access to commercial networks in times of emergency (similar to existing WPA for voice)
 6. PS devices required to tune across the 700 MHz band, including the D block, to enable roaming
- Options
 1. To insure interoperability, may be necessary to impose technology standard on 700 MHz PS systems (i.e., LTE)
 2. To ensure efficient use of spectrum, FCC should consider establishing transition of 14 MHz narrowband (12 MHz + 2 MHz guard band) to broadband use over time. Voice traffic could ride on top of broadband platform