

**Before the  
Federal Communications Commission  
Washington, DC 20054**

In the Matter of )  
 )  
700 MHz Band Mobile Equipment ) RM No. 11592  
Design and Procurement Practices )

**COMMENTS OF AT&T INC.**

AT&T Inc., on behalf of AT&T Mobility LLC and its wholly-owned and controlled wireless affiliates (collectively, “AT&T”), hereby submits its comments in response to the Public Notice dated February 18, 2010<sup>1</sup> seeking input on a Petition for Rulemaking (the “Petition”) pertaining to the design and certification of mobile equipment operating in the 700 MHz band.<sup>2</sup>

**SUMMARY**

The 700 MHz Block A Good Faith Purchaser Alliance (the “Alliance”), comprised of four Lower 700 MHz A block licensees, asks the Commission to establish a rulemaking to require all 700 MHz capable devices to operate on every paired 700 MHz band and to impose an immediate freeze on authorizations of mobile equipment that cannot operate in this manner.<sup>3</sup>

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<sup>1</sup> Public Notice, Wireless Telecommunications Bureau Seeks Comment on Petition for Rulemaking Regarding 700 MHz Band Mobile Equipment Design and Procurement Practices, RM No. 11592 (Feb. 18, 2010).

<sup>2</sup> 700 MHz Block A Good Faith Purchasers Alliance, Petition for Rulemaking Regarding the Need for 700 MHz Mobile Equipment to be Capable of Operating on all Paired Commercial 700 MHz Frequency blocks (filed Sept. 29, 2009) (“Petition”). The Alliance consists of Cellular South Licenses Inc., Cavalier Licenses, LLC, Continuum 700, LLC, and King Street Wireless, L.P.

<sup>3</sup> A recent *ex parte* letter filed by Cellular South, Inc. suggests that the Alliance may eventually seek to expand its requests to all paired frequency blocks, which would require that 700 MHz devices operate on all 700 MHz, 850 MHz cellular, 1900 MHz PCS, and AWS frequencies. The reasoning in these Comments for denying the Alliance’s request would apply with equal force if that is the Alliance’s intention. Cellular South, Inc. *Ex Parte*, WT Docket

For the reasons stated below, the Commission should dismiss the Alliance Petition without establishing a rulemaking.

The Petition takes issue with LTE device standards adopted by the 3<sup>rd</sup> Generation Partnership Project (“3GPP”), asserting that they were developed at the behest of AT&T and Verizon Wireless for the purpose of excluding competition. The 3GPP adopted the standards for 700 MHz LTE Bands 12, 13, 14, and 17 based upon technical considerations surrounding anticipated operations within each 700 MHz block, and only after careful deliberation. Band 12 includes the lower A, B and C blocks. Concerns about interference with reception in the A block led to the creation of Band 17. Specifically, proximity of the A block spectrum pairs to TV broadcast transmissions in Channel 51 on the one hand, and to and high power broadcast transmissions in the unpaired 700 MHz D block and E block on the other, led Motorola to propose the adoption of Band 17, limited to the lower B and C blocks. AT&T, as well as other members of 3GPP, supported Motorola’s proposal because of these valid interference concerns.

Although the interference issues associated with the A block are well known, it is telling that the Alliance’s Petition contains no reference to it. The Petition also fails to mention the public interest harm that would flow from a decision to mandate that all 700 MHz capable equipment operate on all 700 MHz bands. Not only would such a decision subject 700 MHz licensees and their customers to significant interference, it could also limit the features and spectrum bands supported by new 700 MHz devices due to the need for additional chipsets, filters, and other equipment to service all 700 MHz blocks. Even if it were technically feasible to incorporate all of this equipment into a single device, it would require tradeoffs, and it is questionable whether such a device, which would likely include less functionality, a larger form

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No. 09-66, GN Docket No. 09-157, WT Docket No. 05-265, RM No. 11497, RM No. 11592, GN Docket No. 09-51, GN Docket No. 09-137 (filed March 9, 2010) (“Cellular South *Ex Parte* Letter”).

factor and a bigger price tag (in addition to the greater interference problems), would still be appealing to consumers.

The Alliance and all other 700 MHz A block licensees were, or reasonably should have been, well aware of the technical issues associated with the A block before they purchased the licenses in Auction 73. Those technical issues and the need to account for them had been addressed by the Commission on multiple occasions before the auction and they account for the substantially lower amounts of the winning bids in the A block. To impose the requirements the Alliance proposes would retroactively change the rules of the Auction and call into question the integrity of the Commission's auction process.

The Commission has historically recognized the need to allow the marketplace and the technical experts to establish handset capabilities. In particular, the Commission has repeatedly emphasized a flexible use approach to 700 MHz services and technologies. This is not surprising. The Commission recognizes that the marketplace best determines the pace of technological change and the features and services that are offered by carriers and the manner in which they are offered. Attempts to regulate technology inevitably result in obsolete rules that freeze innovation and discourage investment. It would also frustrate the goal of the National Broadband Plan to encourage the rapid deployment of mobile broadband services. For these reasons, AT&T encourages the Commission to dismiss the Alliance's Petition.

## **DISCUSSION**

3GPP is an international standards setting organization that publishes mobile device and network standards. In 2009, 3GPP established Release 8, which sets forth the standards for long term evolution ("LTE") network deployment in the 700 MHz band. Release 8 contains

specifications for four different categories of equipment functionality in the 700 MHz band, with each category based upon the 700 MHz block supported, called “Bands”:

Band	Block Supported
12	Lower A block Lower B block Lower C block
13	Upper C block
14	Upper D block and Public Safety Broadband Allocation
17	Lower B block Lower C block

In its Petition, the alliance, in effect, asks the Commission to ignore the considered opinions of the technical experts at 3GPP and instead impose, by regulatory mandate, a single 700 MHz Band class (i.e. handsets would support all paired 700 MHz blocks). As demonstrated below, the 3GPP’s standards are based on sound engineering principles and designed to protect against interference. The alliance’s insinuation that Bands 17 and 13 exist solely to disadvantage A Block licensees leaves out some material facts that explain the legitimate reasons for the creation of these bands. Moreover, the Alliance’s dire predictions about the likely impact of such standards on A Block licensees and rural consumers are both unsupported and unsupportable.

**A. Band 17 Was Adopted to Address Interference Concerns.**

The Alliance alleges that Band 17 was created at the behest of AT&T and suggests that AT&T has some sinister motive for seeking manufacturers to develop Band 17 handsets.<sup>4</sup> However, in a theme common to many statements in the Petition, the Alliance offers no support for either position. In fact, the statements are inaccurate. Motorola, not AT&T, originally proposed the plan for Band 17 (originally Band 15) in the 3GPP standards process. Motorola proposed the separate band plan for purely technical reasons arising from possible interference between the A block and other spectrum bands. As Motorola explained when it proposed Band Class 17:

The rationale for this new band is to address possible co-existence issues with High power TV broadcast transmission in Channel 51 and other broadcast transmission in channel 55 (block D) and channel 56 (block E).<sup>5</sup>

AT&T supported Motorola's proposal on that basis. Motorola has subsequently explained the basis for its proposal in more detail:

The multiple band classes defined by the 3GPP standards organization result from that organization's recognition of [] variability among devices and the technical challenges of producing mobile devices in the band that cover all of the commercial blocks given the particularly difficult interference environment. One example is 3GPP band class 17 which specifies operation in the lower 700 MHz blocks B and C. In this case, the difficulties associated with potential interference from mobile devices to TV channel 51 receivers and interference from block D and E 50 kW transmitters drove the development of this band class in order to implement duplexer / filter requirements with current technology.<sup>6</sup>

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<sup>4</sup> *Id.*

<sup>5</sup> Motorola, *TS36.101: Lower 700 MHz Band 15*, R4-081108, 3GPP TSG RAN WG4 (Radio) Meeting #47, Kansas City, April 5-9, 2008, available at [http://www.3gpp.org/ftp/tsg\\_ran/WG4\\_Radio/TSGR4\\_47/Docs/R4-081108.zip](http://www.3gpp.org/ftp/tsg_ran/WG4_Radio/TSGR4_47/Docs/R4-081108.zip).

<sup>6</sup> Motorola Comments at p. 2, ET Docket RM-11592 (filed Feb. 9, 2010) ("Motorola Comments").

The potential interference issues associated with Channels 51 (TV), 55 (Lower D block), and 56 (Lower E block) are caused by the location of those channels adjacent to the paired A block bands, as demonstrated in the Lower 700 MHz Band plan table below, and the technical rules applicable to operations in these bands.

Lower 700 MHz Band								
TV	A	B	C	D	E	A	B	C
CH 51	CH 52	CH 53	CH 54	CH 55	CH 56	CH 57	CH 58	CH 59

The 700 MHz D and E block licenses, as unpaired 6 MHz bands, are best suited to broadcast services, and thus, are allowed to operate at 50 kW. Such high powered operations adjacent to the A block pair on Channel 57 creates the potential for unacceptable interference with reception on the A block and would also impact the B and C blocks in the receiver within a mobile device. As referenced by Motorola, the location of the other A block pair on Channel 52 creates interference concerns for TV operations in Channel 51. The best way to alleviate this interference potential was to create Band 17, and thus, limit the operation of some 700 MHz devices to the Lower B and C blocks.

There is no evidence that the Alliance or any of its members responded to Motorola’s concerns in the 3GPP standards process or objected to the creation of Band 13 or Band 17. The 3GPP standards process, as with most standards efforts, is an open, contribution-driven process. All contributions are publicly disclosed on a website and can be accessed by the general public. Any of the Alliance members, by getting involved in the process, could have offered

contributions or engaged in discussions about the Band classes either directly, through industry organizations, or through the handset manufacturers. They elected to not do so.

**A. The Commission’s Flexible Use Approach to the 700 MHz Band Contemplated the Potential for Interference.**

**1. Deviating from the Commission’s Flexible Use Approach Operates Against the Public Interest.**

The Commission has consistently adopted a flexible use approach to 700 MHz band operations—allowing licensees substantial flexibility in their choice of use, technology, and devices based upon the business needs of the licensee.<sup>7</sup> The Commission explained its flexible use policy:

In adopting flexible spectrum use policies for the commercial spectrum in the 700 MHz Band, . . . the Commission has sought to remove regulatory impediments in order to enable more efficient use of licensed spectrum. Under existing rules, 700 MHz Band licensees have wide latitude to adopt and implement spectrum management techniques to manage access to and use of their spectrum, so long as they are consistent with the Commission’s rules relating to the spectrum and the prevention of harmful interference. As a matter of practice, licensees continually devise and update the types of advanced devices they deploy, and improve the management of the dynamic spectrum use between and among their subscribers, consistent with the applicable service rules and their respective business models.<sup>8</sup>

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<sup>7</sup> *Reallocation and Service Rules for the 698-746 MHz Spectrum Band (Television Channels 52-59)*, GN Docket 01-74, para. 70 (Jan. 18, 2002) (“We will apply Section 27.2 of the Commission’s rules to define the permissible communications for the Lower 700 MHz Band and allow a multitude of fixed, mobile, and broadcast uses that the market may demand. . . . [T]his flexible use approach will allow the provision of services to the public that could include mobile and other digital new broadcast operations, fixed and mobile wireless commercial services . . . , as well as fixed and mobile wireless uses for private, internal radio needs.”).

<sup>8</sup> Service Rules for the 698-746, 747-762 and 777-792 MHz Bands, Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Section 68.4(a) of the Commission’s Rules Governing Hearing Aid-Compatible Telephones, Biennial Regulatory Review – Amendment of Parts 1, 22, 24, 27, and 90 to Streamline and Harmonize Various Rules Affecting Wireless Radio Services, Former Nextel Communications, Inc. Upper 700 MHz Guard Band Licenses and Revisions to Part 27 of the Commission’s Rules, Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band, Development of Operational, Technical and Spectrum Requirements for Meeting Federal, State and Local Public Safety Communications Requirements Through the Year 2010, Declaratory Ruling on Reporting Requirement under Commission’s Part 1 Anti-Collusion Rule, WT Docket No. 06-150, CC Docket No. 94- 102, WT Docket No. 01-309, WT Docket 03-264, WT Docket No. 06-169, PS Docket No. 06-229, WT Docket No. 96-86, WT Docket No. 07-166, at para. 242 (released Aug. 10. 2007).

This flexible use model has resulted in a highly successful auction of Lower 700 MHz spectrum and is expected to result in diverse 700 MHz service offerings. Deviating from this course now by mandating handset functionality for all paired 700 MHz spectrum bands would not only risk impeding the development of those service offerings, but would also work against the public interest by subjecting all 700 MHz licensees and their customers to significant interference risks, solely for the benefit of A block licensees.<sup>9</sup>

Forcing all 700 MHz capable handsets to operate on all 700 MHz bands could also result in reduced capabilities for 700 MHz handsets and increase the price that consumers pay for those handsets. In the National Broadband Plan, the Commission acknowledged the difficulties of accurately keeping pace with the rapid rate of innovation and accurately predicting consumer and technology preferences: “Technologies, costs and consumer preferences are changing too quickly in this dynamic part of the economy to make accurate predictions.”<sup>10</sup> In fact, designing, manufacturing, and deploying handsets is not a process that is conducive to regulatory mandates, as it requires a balancing of many factors, such as a carrier’s business plans, spectrum holdings, desired handset form and size, and cost. To ensure the broadest coverage, 700 MHz capable handsets are likely to operate on other spectrum bands as well, such as cellular and PCS and possibly in Bluetooth, Wi-Fi, and international bands. Adding all 700 MHz bands to this list may require manufacturers to incorporate more filters, RF chipsets, or other equipment into the device than necessary. While it may be possible to include all of these capabilities into a device, doing so would impose undesirable costs, require more complex and costly testing and likely

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<sup>9</sup> No one, including the Alliance, argues that the Commission should dictate the network technology of choice for 700 MHz licensees, although that is the absurd result if the Alliance’s argument is taken to its logical conclusion. For all 700 MHz capable handsets to be compatible with 700 MHz A block licensee networks, those handsets must utilize the same network technology.

<sup>10</sup> *The National Broadband Plan*, Section 4.1, p. 42.

would result in increased device sizes. Manufacturers could be forced to consider other tradeoffs that would reduce or remove features or functionality to the detriment of consumers.

Alternatively, manufacturers might be forced to develop 700 MHz-only devices that cannot roam onto 850 MHz cellular or 1900 MHz PCS networks. These types of trade offs could lead to gaps in service that harm the public interest. For example, 700 MHz only devices could create public safety islands by preventing a future 700 MHz public safety network from plugging 700 MHz coverage gaps with existing 850/1900 MHz networks of commercial wireless carriers.

## **2. Auction Participants, Including the Alliance Members, Were On Notice of the Potential Interference Issues in the A Block.**

The Commission’s 700 MHz auction notice reminded potential bidders “that they are solely responsible for evaluating all technical and marketplace factors that may have a bearing on the value of the 700 MHz licenses.”<sup>11</sup> In the notice, the Commission also alerted potential bidders that the auction date provided sufficient time “to develop business plans, assess market conditions, and evaluate the availability of equipment for new 700 MHz Band services.”<sup>12</sup> More pointedly, the Commission directly addressed the interference potential to Channel 51:

We will not adopt a guard band or other specialized mechanism to protect DTV operations on Channel 51, but will instead rely on our interference protection criteria to ensure that new licensees adequately protect core TV channel operations. . . . As for making special considerations for new licensees – such as adjusting our allocation to minimize the presence of systems with low immunity to high power signals – we opt for a flexible approach and will look to them to consider potential interference situations when designing and developing their systems. ***We believe that bidders for this spectrum will take into account criteria established to protect the core TV channels and will develop their business plans, services, and facilities accordingly.***<sup>13</sup>

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<sup>11</sup> Public Notice, Auction of 700 MHz Band Licenses Scheduled for January 24, 2008, DA 07-4171, 22 FCC Rcd 18141, at paras. 40 (\_\_\_\_).

<sup>12</sup> *Id.* at 43.

<sup>13</sup> Reallocation and Service Rules for the 698-746 MHz Spectrum Band (Television Channels 52-59), GN Docket 01-74, para. 23 (Jan. 18, 2002) (emphasis added).

The auction results suggest that the A block licensees heeded the Commission's advice, as evidenced by the considerably lower price paid for A block spectrum than for B block spectrum. In Auction 73, A block licenses sold for an average of \$1.13 per MHz POP, compared to an average of \$2.65 per MHz POP paid for B block spectrum.<sup>14</sup> It is likely that the susceptibility of the Lower A block to interference accounts in large part for the relative difference in the prices between the A block and the B block.

The Alliance's Petition would retroactively expose all 700 MHz licensees (and their future subscribers) to the same interference risks that the A Block licensees freely accepted when they purchased their spectrum licenses and reduce substantially the value of the non-A block 700 MHz licenses. Applicants valued and bid on 700 MHz licenses in reliance on the Commission's rules as enacted prior to the auction. Under those rules, licensees could design their networks and the devices operating on those networks in such a way as to minimize the potential for interference. In fact, AT&T has done just that, devoting substantial resources to designing an LTE 700 MHz network and working with handset manufacturers to ensure the availability of devices that are attractive to customers and allow AT&T to develop its huge investment. Changing the rules two years later would be unlawful, and would call into question the extent to which AT&T, and other bidders, can rely on the integrity of the Commission's auction process.

**B. Granting the Alliance's Request Would Frustrate the Goals of the National Broadband Plan.**

In the National Broadband Plan, the Commission sets a lofty goal of providing every American with affordable access to robust broadband service,<sup>15</sup> with the expectation that mobile

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<sup>14</sup> See Blair Levin et al., Stifel Nicolaus, *Special Focus: The Wireless World After 700MHz*, at 2, 4, Washington Telecom, Media & Tech Insider (Mar. 28, 2008).

<sup>15</sup> *The National Broadband Plan*, Goal No. 3, p. 10.

broadband will play an increasingly important role in achieving that goal.<sup>16</sup> The commercial wireless industry is on pace to help achieve these goals, with many carriers announcing plans to roll out 4<sup>th</sup> Generation (“4G”) wireless networks. AT&T and Verizon have announced plans to deploy 700 MHz mobile broadband networks using 4G LTE technology over the next two years.<sup>17</sup> Granting the restrictions sought by the Alliance—mandates on the development of handsets operating on 4G 700 MHz LTE networks—risks a delay in the rollout of broadband services on these networks.

Since the auction of the 700 MHz spectrum, handset manufacturers, 700 MHz licensees, industry organizations, and standards bodies have been diligently working to develop the standards and protocols needed for the deployment of a LTE network over the 700 MHz band. After much deliberation, 3GPP completed the specifications for Release 8 of LTE, including the creation of Bands 12, 13, 14, and 17 to support 700 MHz handsets, setting the roadmap for LTE deployment. AT&T, Verizon and other 700 MHz licensees have been diligently developing and initiating their business plans for 700 MHz LTE network deployment and working with manufacturers to develop handsets for those networks that are compatible with each carrier’s existing spectrum holdings and business plans. Injecting an artificial requirement that 700 MHz licensee’s deploy only handsets that operate in all paired 700 MHz bands will squander all of these efforts, effectively delaying mobile broadband 4G deployment and frustrating the goals of the National Broadband Plan, as standards bodies reconsider technical specifications, handset

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<sup>16</sup> *Supra. n. 3.*

<sup>17</sup> AT&T has announced its plans to begin LTE trials in 2010, with deployment beginning in 2011. See *AT&T to Deliver 3G Mobile Broadband Speed Boost* (May 27, 2009), available at <http://www.att.com/gen/press-room?pid=4800&cdvn=news&newsarticleid=26835>. Verizon has announced plans to deploy its LTE network in 2010. See *Verizon Wireless Updates Specifications For 4G LTE 700 MHz Devices* (Aug. 21, 2009), available at <http://news.vzw.com/news/2009/08/pr2009-08-21.html>.

manufacturers redesign 700 MHz handsets based upon the new specifications, and 700 MHz licensees rework business plans. As Motorola has observed:

Because the work to define band classes in the standards body is based on technical realities, a Commission action to require mobile devices to be capable of operation over all of the commercial blocks [sic] would significantly delay deployment of broadband services in the 700 MHz band.<sup>18</sup>

Further, as mentioned above, granting the Alliance request would impose design limits on 700 MHz devices. The functionality of mobile devices is a balancing act. On the one hand, wireless carriers seek to incorporate sufficient functionality to accommodate their existing spectrum holdings and business plans and accommodate customer desires for Wi-Fi access, international use, and Bluetooth capability. On the other hand, handset manufacturers and wireless carriers must offer a device with an attractive form and price that can be marketed to the general public. Mere functionality, even if over all frequency bands, will not translate into market success if the phone is perceived as unattractive, too bulky or too expensive. This give and take leads to substantial innovation and diversity of devices.<sup>19</sup> Imposing the unnecessary mandates the Alliance demands, therefore, would not only expose all 700 MHz spectrum users to unnecessary interference, but also would constrain device innovation and reduce the diversity of devices and applications in the mobile ecosystem.

**C. The Alliance Fails to Carry the Burden of Demonstrating that Extraordinary Relief Requested is Justified.**

The Alliance states that if the Commission does not require handsets to operate on all 700 MHz blocks, A block licensees will be left without equipment to provide meaningful roaming services. This argument is illogical. Nothing prevents A block licensees from negotiating

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<sup>18</sup> Motorola Comments at p. 1.

<sup>19</sup> See *supra*. n.4 (“There were more than 850 different certified mobile products in the United States in 2009.”).

roaming deals with any carrier offering services on other 700 MHz blocks, including other A block licensees, or with carriers offering services at 850 MHz, or 1900 MHz to allow their customers to roam. Moreover, any decision by other 700 MHz licensees to not roam on 700 MHz A block networks would not preclude A block licensees from roaming on other networks, even other 700 MHz networks.<sup>20</sup> Further, A block licensees are free to negotiate with handset manufacturers to design, manufacture and deploy wireless handsets and other devices that operate within the spectrum bands that are needed based upon their spectrum holdings and business plans, including Band Class 12 or other commercial spectrum.<sup>21</sup>

The Alliance also claims that not to require that all 700 MHz devices operate in all paired 700 MHz bands would be contrary to Commission precedent, citing a 1981 Commission ruling that analog cellular handsets include both A and B bands.<sup>22</sup> However, the situation was much different in 1981. The Commission imposed the handset requirement in 1981 to facilitate nationwide cellular coverage.<sup>23</sup> At that time, only cellular spectrum was released for commercial mobile operations, and thus, there were no other options for wide spread coverage. By contrast, today there are multiple wireless licensees in every part of the country, including four carriers with nationwide coverage, each with its own spectrum licenses in multiple different bands. In keeping with its policies of flexible use, the Commission has not imposed any device mandates

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<sup>20</sup> The Petition also complains that AT&T and Verizon customers will not be able to roam on the A block licensee networks. The Commission should not take action to force carriers to utilize a certain spectrum band for roaming. Carriers should remain free, in a competitive market, to choose their roaming partners based on factors like network compatibility, price, coverage, and call quality.

<sup>21</sup> The Alliance also argues, without evidence, that it AT&T's and Verizon's actions are anticompetitive and that it cannot effectively compete against AT&T and Verizon. Cellular South's 2009 growth rate in net activations (10.26%) compared to that of AT&T (9.35%) and Verizon (7.01%) belies that statement. See Cellular South *Ex Parte*.

<sup>22</sup> *Petition* at p. 10.

<sup>23</sup> *Cellular Communications Systems*, 86 FCC 2d, 469, 482 (1981) ("This is necessary in order to insure full coverage in all markets and capability on a nationwide basis.").

upon other licenses used to provide mobile wireless services, such as ESMR, PCS, AWS, EBS, BRS, MSS or 700 MHz. Indeed, what the Alliance seeks would be a departure from Commission policies. Further, the cellular spectrum did not present the Commission in 1981 with the kinds of interference and technical issues that the A block presents today.

The Alliance has failed to provide any compelling reason why the Commission should grant the relief it seeks. Such mandates would expose all users of 700 MHz spectrum to unwanted interference, increase the cost and decrease the capabilities of 700 MHz devices, reduce innovation and delay mobile broadband deployment. Moreover, to impose such a constraint would impair the value of 700 MHz spectrum licenses, and to change the rules now, retroactively, would be unlawful and would call into question the integrity of the auction process.

For the foregoing reasons, AT&T urges the Commission to dismiss the Alliance Petition.

March 31, 2010

Respectfully submitted,

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