

May 3, 2010

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

Re: *Amendment of Part 27 of the Commission's Rules to Govern the Operation of
Wireless Communications Services in the 2.3 GHz Band (WT Docket No. 07-293)* --
WRITEN EX PARTE PRESENTATION

Dear Ms. Dortch:

In response to a request from Commission staff, we are writing to provide additional background information regarding the reply comments submitted by the WCS Coalition with respect to the Commission's *Public Notice* proposing to revise performance requirements applicable to the 2.3 GHz band Wireless Communications Service ("WCS").¹

In its reply comments, the WCS Coalition provided the Commission with a table identifying thirteen MEAs in which the total percentage of the population within the proposed 45 kilometer mobile aeronautical telemetry ("MAT") coordination zones appeared to exceed 40%, although precise figures were impossible to determine because the National Telecommunications and Information Administration ("NTIA") has been unable to release the exact coordinates of federal MAT facilities.² The staff has requested additional information regarding the methodology employed by the WCS Coalition's mapping consultant, Spectrum Management Consulting ("SMC"), to develop the information provided by the WCS Coalition in that table.

To develop the data, SMC first drew a circle with a 45 kilometer radius around the specific coordinates for non-federal MAT sites provided by the Aerospace and Flight Test Radio Coordinating Council ("AFTRCC"). Because NTIA has been unable to provide specific coordinates for federal MAT facilities, SMC reviewed the material that had been provided by NTIA identifying generally the markets in which federal MAT facilities were located. SMC

¹ Federal Communications Commission Requests Comment on Revision of Performance Requirements for 2.3 GHz Wireless Communications Service, *Public Notice*, FCC 10-46 (rel. Mar. 29, 2010) (the "*Performance Public Notice*").

² See Reply Comments of the WCS Coalition, WT Docket 07-293, at 7 (filed April 29, 2010).

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searched within those areas to locate airports or military bases that were likely to house MAT facilities, and if any were located, the coordinates for those sites were used in the analysis. Where no likely MAT location appeared, SMC utilized the central coordinates for the NTIA-designated market returned by Google Earth.

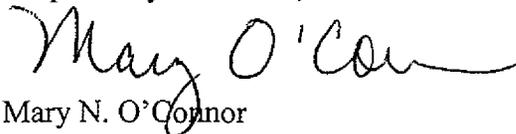
Upon ascribing coordinates for each of the federal MAT sites, a circle with a 45 kilometer radius from those coordinates was drawn. SMC then generated a map showing circles for all federal and non-federal MAT facilities. Each of the coordinates employed by SMC in its analysis is identified in the attachment to this letter. Because the specific coordinates used for non-federal MAT facilities were provided by AFTRCC to the WCS community under a non-disclosure agreement, the attachment to this letter redacts the non-federal coordinates. Under separate cover, the WCS Coalition is submitting an unredacted copy of this attachment with a request for confidential treatment.

All population figures in the table for each of the MEAs were taken from the 2000 U.S. Census, projected by the Census Bureau to the year 2006, which was the latest data available to SMC. Once 45 kilometer coordination zones were ascribed to each MAT facility, the MEA boundaries were overlaid on that map and SMC was able to identify for each MEA all areas that were within a coordination zone. Next, the overlapping areas between coordination zones were removed so as not to double count the underlying population. Then the population inside the proposed 45 kilometer coordination zones within each MEA was counted to identify the total population within the combined area of the coordination zones within each MEA. To calculate the percentage of the population affected by coordination zones in each MEA, the population within the proposed 45 kilometer coordination zones within the MEA was divided by the total population of the MEA.

Pursuant to Sections 1.1206(b)(1) and 1.49(f) of the Commission's Rules, this letter is being filed electronically with the Commission via the Electronic Comment Filing System.

Should you have any questions regarding this supplement, please contact the undersigned.

Respectfully submitted,



Mary N. O'Connor

Counsel to the WCS Coalition

cc: Richard Arsenault
Ken Keane

MEA	MEA Name	Population Within 45 km of MAT	Total Population	% of MEA Affected	Federal Estimated Coordinates in MEA		Non Federal Coordinates in MEA	
					Lat	Lon	Lat	Lon
40	Phoenix	4,712,272	5,486,856	85.88%	33-28-20.42 N	111-57-47.92 W	REDACTED	REDACTED
					32-26-36.09 N	110-45-26.98 W		
					33-28-20.42 N	111-57-47.92 W		
					31-35-18.78 N	110-20-40.01 W		
					32-9-58.64 N	110-52-59.01 W		
					37-17-20.99 N	109-17-1.51 W		
44	Los Angeles-San Diego	20,935,696	24,607,011	85.08%	34-34-2.67 N	114-21-26.46 W	REDACTED	REDACTED
					32-52-11.03 N	114-22-59.57 W		
					34-15-48.74 N	116-51-16.63 W		
					33-7-39.99 N	117-16-48.90 W		
					35-41-18.60 N	117-41-27.37 W		
					34-54-20.10 N	117-53-1.03 W		
					34-43-49.5 N	120-34-15.96 W		
					33-47-22.34 N	118- 3-6.65 W		
					34-0-50.09 N	118- 3-10.20 W		
					35-3-25.96 N	118- 9-1.64 W		
					34-37-44.64 N	118- 5-3.89 W		
					34-7-14.83 N	119- 7-14.70 W		
					32-41-56.47 N	117-12-53.32 W		
					33-14-57.54 N	119-29-54.46 W		
					34-36-24.20 N	120- 4-32.09 W		
					34-21-39.03 N	117-37-49.35 W		
					36-19-6.10 N	115-34-31.33 W		
					36-14-4.36 N	115- 2-40.24 W		
					37-8-15.34 N	113-18-23.03 W		
3	Buffalo	1,178,458	1,486,064	79.30%	42-56-1.26 N	78-44-3.81 W		
11	Miami	5,238,426	6,921,701	75.68%	25-30-7.18 N	80-33-23.90 W	REDACTED	REDACTED

MEA	MEA Name	Population Within 45 km of MAT	Total Population	% of MEA Affected	Federal Estimated Coordinates in MEA		Non Federal Coordinates in MEA	
					Lat	Lon	Lat	Lon
					26-56-5.36 N	80-5-47.69 W		
					24-33-17.09 N	81-45-35.13 W		
					25-47-28.17 N	80-17-28.32 W		
					26-40-47.26 N	80-5-46.50 W		
4	Philadelphia	5,252,085	8,677,952	60.52%	39-40-42.20 N	75-36-23.95 W		
					39-40-24.78 N	75-36-49.17 W		
					39-52-30.75 N	75-14-37.60 W		
46	Seattle	3,022,975	5,097,328	59.31%	47-31-53.35 N	122-17-59.74 W	REDACTED	REDACTED
30	St. Louis	2,420,795	4,929,348	49.11%	38-34-12.33 N	90- 9-43.59 W	REDACTED	REDACTED
35	Wichita	574,502	1,175,125	48.89%	37-37-4.48 N	97-16-40.08 W	REDACTED	REDACTED
5	Washington	4,501,108	9,424,479	47.76%	38-48-19.62 N	76-52-16.17 W		
					38-4-0.49 N	77-19-2.45 W		
					37-56-14.73 N	75-28-18.04 W		
9	Jacksonville	1,333,059	2,794,958	47.70%	30-23-30.95 N	81-25-24.85 W		
					30-14-9.02 N	81-40-50.97 W		
					30-12-15.88 N	85-41-1.20 W		
					29-45-8.81 N	85-17-25.58 W		
32	Dallas-Fort Worth	5,945,685	12,589,441	47.23%	35-12-28.03 N	101-43-7.35 W	REDACTED	REDACTED
					32-44-7.78 N	96-57-43.80 W		
					33- 4-14.10 N	96- 4-29.05 W		
					31-21-6.02 N	100-30-7.13 W		
					31-36-21.41 N	97-13-35.15 W		

MEA	MEA Name	Population Within 45 km of MAT	Total Population	% of MEA Affected	Federal Estimated Coordinates in MEA		Non Federal Coordinates in MEA	
					Lat	Lon	Lat	Lon
33	Denver	2,456,076	5,374,871	45.70%	37-26-6.42 N	105-51-58.71 W	REDACTED	REDACTED
					38-32-1.78 N	106-55-59.26 W		
					39-13-12.91 N	106-18-59.11 W		
					37-57-14.07 N	107-54-28.94 W		
					39-42-40.06 N	104-45-25.16 W		
38	San Antonio	1,628,857	4,033,791	40.38%	29-22-32.41 N	98-35-11.87 W		