

Ms. Marlene H. Dortch  
Secretary, Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

September 1, 2011

Re: **Notice of Ex Parte Presentation: Applications of AT&T Mobility Spectrum LLC and Qualcomm Incorporated for Consent to Assign or Transfer Control of Lower 700 MHz Band Licenses, WT Docket No. 11-18**

Dear Ms. Dortch:

On August 30, 2011 Dean Brenner of QUALCOMM Incorporated (“Qualcomm”), Joan Marsh of AT&T, and the undersigned met with Rick Kaplan, Chief of the Wireless Telecommunications Bureau, Renata Hesse, Senior Counsel to Chairman Genachowski for Transactions, Paul De Sa, Chief of the Office of Strategic Planning & Policy Analysis, and Charles Mathias, Nese Guendelsberger, Monica DeLong, Nicole McGinnis, Patrick DeGraba, Tom Peters, and Paul Murray, all of the Wireless Telecommunications Bureau.

Mr. Brenner described Qualcomm’s initial acquisition of its 700 MHz licenses, the company’s experience with the MediaFLO business, and the process of deciding to exit the MediaFLO business. He described how deployment of new supplemental downlink technology on the spectrum being sold to AT&T will advance the FCC’s spectrum policies, will support US innovation and enhance US global leadership in mobile technology (because AT&T will be the first carrier in the world to deploy supplemental downlink if the spectrum sale is approved) and how the technology will allow better use of the currently underutilized licenses. Mr. Brenner and Ms. Marsh explained the substantial limitations of unpaired spectrum. They explained how unpaired spectrum is fundamentally different from paired spectrum and that while supplemental downlink makes unpaired spectrum easier to use, mobile broadband companies strongly prefer and will pay substantially more to acquire paired spectrum.

Ms. Marsh also explained that AT&T intends to use the Qualcomm licenses for mobile broadband using supplemental downlink at cellular-type power levels, and not for higher-powered one-way operations. Ms. Marsh and Mr. Brenner explained that AT&T’s use of supplemental downlink would not preclude any other company from using supplemental downlink in another band. Mr. Brenner explained how the use of supplemental downlink would actually reduce any interference concerns between operations on Channels 56 and 57 in the five Economic Areas in which AT&T is acquiring Lower E block spectrum from Qualcomm and that AT&T will not bond the Lower D and E block spectrum it is acquiring to the Lower B and C block spectrum it owns in order to avoid any self-interference within handsets.

Pursuant to the Commission's rules, a copy of this notice is being filed electronically in the above-referenced docket. If you require any additional information please contact the undersigned at 202.730.1352 or [pmargie@wiltshiregrannis.com](mailto:pmargie@wiltshiregrannis.com).

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Paul Margie', written over the text 'Respectfully submitted,'.

Paul Margie  
*Counsel for QUALCOMM Incorporated*