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September 22, 2011

**VIA ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
Washington, DC 20554

Re: *The Proposed Extension of Part 4 of the Commission's Rules Regarding Outage Reporting to Interconnected Voice Over Internet Protocol Service Providers and Broadband Internet Service Providers – PS Docket No. 11-82*

*Amendment of Parts 1, 2, 22, 24, 27, 90 and 95 of the Commission's Rules to Improve Wireless Coverage Through the Use of Signal Boosters – WT Docket No. 10-4*

*Amendment of Parts 1, 21, 73, 74 and 101 of the Commission's Rules to Facilitate the Provision of Fixed and Mobile Broadband Access, Educational and Other Advanced Services in the 2150-2162 and 2500-2690 MHz Bands – WT Docket No. 03-66*

**NOTICE OF ORAL EX PARTE PRESENTATION AND SUBMISSION OF WRITTEN MATERIAL**

Dear Ms. Dortch:

I am writing pursuant to Section 1.1206(b) of the Commission's Rules to notify the Commission that yesterday, Fred Campbell, President and Chief Executive Officer of the Wireless Communications Association International, Inc. ("WCAI"), Brian Benison of AT&T, Ray Rothermel of Sprint Nextel, Cathleen A. Massey of Clearwire and the undersigned met on behalf of WCAI with Rick Kaplan, Chief of the Wireless Telecommunications Bureau, and the members of the Bureau staff copied on this letter and identified below.

During the course of the meeting, WCAI presented background regarding its membership, a progress report on the re-purposing of the 2.5 GHz band, and its views regarding the three proceedings referenced above. WCAI distributed to those in attendance copies of a PowerPoint presentation, a copy of which is attached, that sets forth the substance of its

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presentation regarding those three proceedings. In addition, in response to a staff inquiry, WCAI clarified that it has no objection in WT Docket 10-4 to the utilization of signal boosters by licensees operating within their own authorized spectrum.

Pursuant to Sections 1.1206(b)(2)(i) 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 WCAI's presentation or this notice, please contact the undersigned.

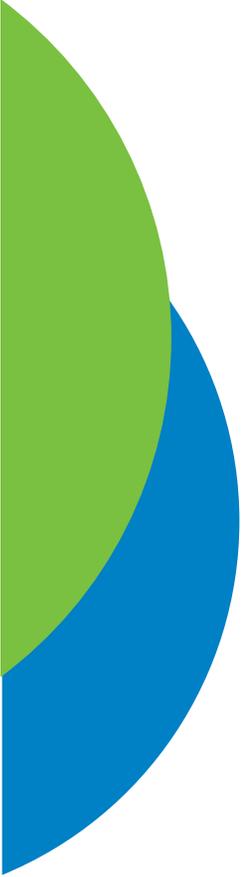
Respectfully submitted,



Paul J. Sinderbrand

Attachment

cc: Rick Kaplan  
John Leibovitz  
Matthew Nodine  
Charles Mathias  
Blaise Scinto  
Roger Noel  
Thomas Derenge  
John Schauble  
Nancy Zaczek



# Promoting 4G Deployment

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## Key Issues

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- *OOBE Limits*: The OOBE limits in the 2.5 GHz band should be revised to accommodate wider channels.
- *Signal Boosters*: Wireless providers are in the best position to reasonably manage the use of signal boosters within their networks.
- *Outage Reporting*: Wireless providers should be required only to report actual outages rather than quality of service variations.



# 4G Deployment Is Accelerating

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- BRS/EBS licensees have already invested billions of dollars deploying 4G networks.
- The transition to 4G is now accelerating.
  - Licensees in the 2.5 GHz band are planning additional deployments using the most recent 4G standards.
  - Licensees in other bands are transitioning to 4G networks.



## Brief History of the 2.5 GHz Band

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- The band has a long history of public-private partnerships between educational and commercial licensees.
- This innovative approach is maximizing the benefits of wireless broadband for commercial and educational users.
- BRS/EBS licensees have invested billions of dollars in network deployment in the last two years and are now planning advanced LTE networks.



## OOBE Limits in the 2.5 GHz Band

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- The National Broadband Plan's second goal is to “lead the world in mobile innovation, with the fastest and most extensive wireless networks of any nation.”
- To lead the world, U.S. mobile networks must meet or exceed the world's standards.
- The ITU's IMT-Advanced standard mandates scalable channel bandwidths up to and including 40 MHz.
- Licensees in the 2.5 GHz band are planning to deploy wider channels, but the current OOBE limits in the 2.5 GHz band limit mobile devices to 10 MHz channels.
- The OOBE limits for the 2.5 GHz band should be revised to accommodate the use of wider channel bandwidths.



# Signal Boosters

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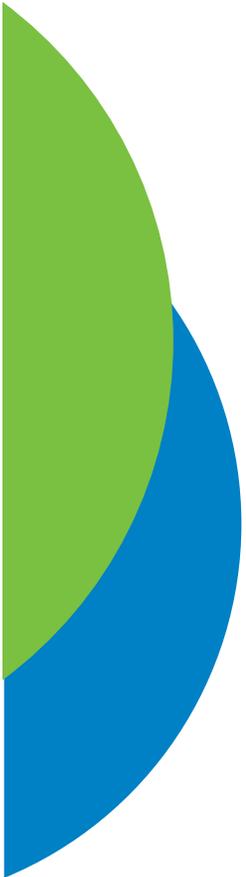
- Signal boosters present a risk of harmful interference to the network (either by completely blocking other customers' signals or degrading data rates) that must be balanced against the potential coverage benefits signal boosters provide.
- Balancing these concerns involves reasonable network management.
  - Wireless providers have strong incentives to maximize network performance and are in the best position to reasonably manage the use of signal boosters within their networks.
  - Manufacturers and consumers do not share wireless providers' incentives to maximize network performance.
- Wireless providers should be allowed to reasonably manage their networks by exercising control over the use of signal boosters.



# Outage Reporting

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- In the wireless context, events described in the proposed rules are not necessarily outages.
- Wireless providers should be required only to report actual outages rather than quality of service variations.
- Given the substantial costs involved, smaller wireless providers should be exempt from outage reporting.



**Thank You!**

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