



**Joan Marsh**  
Vice President –  
Federal Regulatory

AT&T Services, Inc.  
1120 20<sup>th</sup> Street, N.W.  
Suite 1000  
Washington, D.C. 20036

202.457.3120 Phone  
832.213.0172 Fax  
joanmariemarsh@att.com

December 22, 2011

**VIA ECFS**

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

Re: *Applications of AT&T Mobility Spectrum LLC and Qualcomm  
Incorporated for Consent to the Assignment of Licenses,*  
WT Docket No. 11-18  
**NOTICE OF EX PARTE PRESENTATION**

Dear Ms. Dortch,

The interference challenges into the 700 MHz Lower A block are significant. The high power broadcasts currently permitted in Channel 51 and in the 700 MHz Lower E block create the potential for significant interference problems for LTE deployments in the adjacent A block. Indeed, Band Class 17 was created in the 3GPP standards-setting process specifically to address these interference issues. AT&T agrees that these challenges can and should be addressed.

AT&T further agrees that, if the interference challenges described above are addressed to AT&T's satisfaction, AT&T will not object, assuming supply chain availability, to supporting interoperability in the paired spectrum in the Lower 700 MHz band no more than two years after the later of the effective date of new rules relieving the Lower A block of the interference concerns, the end date of any transitional operating period that is allowed for any spectrum uses that create Lower A block interference concerns or the date when any existing broadcast uses are relocated from Channel 51 and the E block (provided further that Lower 700 MHz licensees are not responsible for the costs of any such relocations). AT&T will consider a shorter transition period if, in AT&T's view, it is commercially feasible.

To fully address the interference challenges, AT&T believes that the Commission must, at a minimum, modify the rules governing service in Channel 51 and in the 700 MHz Lower E block to permit power levels, out of band emissions and antenna heights that are no greater than those currently permitted in the 700 MHz Lower A and B blocks, to allow downlink only in the Lower E block and uplink only in Channel 51, and to relocate any incumbent high power broadcast operations out of Channel 51 and the

Lower E block. Indeed, to address interference concerns into the 700 MHz Lower C block, the Commission is proposing similar limitations on AT&T's use of the Lower D and E blocks in the draft Order currently pending in this proceeding. AT&T reserves the right to offer additional guidance in any rulemaking that may be initiated on these issues.

In all events, AT&T reserves the right, in its sole discretion, to plan and manage Lower 700 MHz interoperability support in a manner that will not disrupt existing services, strand existing devices or result in unnecessary cost or delay. AT&T explicitly reserves the right to continue to support Band Class 17 at its sole discretion.

In accordance with Commission rules, this letter is being filed electronically with your office for inclusion in the public record.

Sincerely,

A handwritten signature in black ink, appearing to be 'JM', followed by a horizontal line extending to the right.

Joan Marsh

cc: Louis Peraertz, Esq.  
Rick Kaplan, Esq.  
Best Copy and Printing, Inc.  
Kathy Harris, Esq.  
Ms. Kate Matraves  
Jim Bird, Esq.