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February 21, 2012

VIA ECFS

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

Re: Operation of Wireless Communications Services in the 2.3 GHz Band (WT Docket No. 07-293); New DBSD Satellite Service G.P., Debtor-in-Possession, and TerreStar Licensee Inc., Debtor-in-Possession, Request for Rule Waivers and Modified Ancillary Terrestrial Component Authority (IB Docket No. 11-149); Petition for Rulemaking Regarding the Need for 700 MHz Mobile Equipment to be Capable of Operating on All Paired Commercial 700 MHz Frequency Blocks (RM-11592)

NOTICE OF EX PARTE PRESENTATION

Dear Ms. Dortch,

On Thursday, February 16, 2011, Robert Quinn and Joan Marsh, representing AT&T, met with Rick Kaplan, Renata Hesse, Jim Schlichting, Paul Murray, Nese Guendelsberger, Tom Peters and Melissa Tye of the FCC's Wireless Bureau.

During the meeting, we discussed the interference challenges in the lower 700 MHz band. To address these issues, AT&T believes that the Commission would need to modify its rules to address interference challenges caused by Channel 51 and the Lower E block licenses that still permit high power broadcasts. First, the Commission would need to prohibit extremely high power broadcasts by DTV stations on Channel 51 in order to eliminate potential interference from such broadcasts into LTE base stations and Band 12 device interference into television receivers operating on Channel 51.

Second, to eliminate interference resulting from high power transmissions on the Lower E block, the Commission would need to adopt service rules -- similar to those for the 700 MHz Lower A and B blocks -- that impose lower power and antenna height requirements, and govern co-location, interference coordination, and downlink-only operations. AT&T has specifically proposed such limitations be imposed on the E block licenses held by Dish in the event that the waiver requested by Dish in the above-referenced proceeding is granted.

If such rule modifications were enacted, and the A Block were largely relieved of the interference concerns that prompted the creation of Band Class 17, we reiterated that

AT&T would not rule out a migration to Band Class 12 in the future. AT&T should remain free, however, to plan and manage any such migration in a way that would not disrupt existing service or result in unnecessary cost or delay.

We also discussed AT&T's pending Petition for Reconsideration of the service rules applicable to the WCS bands. As indicated in the pending Petition, absent modifications to the service rules, WCS spectrum is not suitable for deployment of mobile broadband services using LTE technologies. We encouraged Commission action on the Petition.

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: Rick Kaplan
Renata Hesse
Jim Schlichting
Paul Murray
Nese Guendelsberger
Tom Peters
Melissa Tye