



Robert W. Quinn, Jr.
Senior Vice President
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May 29, 2012

VIA ELECTRONIC SUBMISSION

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

Re : ***Erratum In the Matter of Promoting Interoperability in the 700 MHz Commercial Spectrum; Interoperability of Mobile User Equipment Across Paired Commercial Spectrum Blocks in the 700 MHz Band, WT Docket No. 12-69***

Dear Ms. Dortch:

On Monday, May 21, AT&T Inc. filed an ex parte letter in the above-captioned docket. That submission referenced prior filings but did not include copies of those filings. More specifically, on March 26, 2012, AT&T submitted an ex parte in *WT Docket No. 12-69*, and on December 22, 2011, AT&T submitted an ex parte in *WT Docket No. 11-18*. AT&T is submitting this Erratum, the original May 21 Ex Parte and the two documents referenced above for inclusion in the public record.

If you have any questions or need additional information, please do not hesitate to contact me. Pursuant to section 1.1206 of the Commission's rules, this letter is being filed electronically with the Commission.

Sincerely,

Robert W. Quinn, Jr.

Attachments

Cc : Zachary Katz
Josh Gottheimer
Renee Wentzel

Attachment 1



Robert W. Quinn, Jr.
Senior Vice President
Federal Regulatory and
Chief Privacy Officer

AT&T Services, Inc.
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May 21, 2012

VIA ELECTRONIC SUBMISSION

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

Re : ***In the Matter of Promoting Interoperability in the 700 MHz Commercial Spectrum ; Interoperability of Mobile User Equipment Across Paired Commercial Spectrum Blocks in the 700 MHz Band, WT Docket No. 12-69***

Dear Ms. Dortch :

On Thursday, May 17, James W. Cicconi, Senior Executive Vice President-External & Legislative Affairs, AT&T Inc., and Robert W. Quinn, Jr., Senior Vice President-Federal Regulatory & Chief Privacy Officer, AT&T Inc., discussed the above-referenced proceeding with Zachary Katz, Chief of Staff, Josh Gottheimer, Senior Counselor and Renee Wentzel, Legal Advisor, FCC Office of Chairman Julius Genachowski.

During the discussion, the AT&T representatives expressed their view that industry-led standards efforts are preferable to regulatory mandates. In addition, AT&T also encouraged the FCC to clear high-powered TV Channel 51 expeditiously in order to minimize interference to the Lower 700 MHz licenses.

The position expressed by AT&T during the discussion was consistent with AT&T's prior submissions in this docket.

If you have any questions or need additional information, please do not hesitate to contact me. Pursuant to section 1.1206 of the Commission's rules, this letter is being filed electronically with the Commission.

Sincerely,

Robert W. Quinn, Jr.

Cc : Zachary Katz
Josh Gottheimer
Renee Wentzel

Attachment 2



Joseph P. Marx
Assistant Vice President
Federal Regulatory
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March 26, 2012

Ex Parte

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

Re: Ex Parte Communication, WT Docket No. 12-69

Dear Ms. Dortch:

On Friday, March 23, Joan Marsh sent Louis Peraetz, legal advisor to Commissioner Clyburn, a link to a blog posting entitled No MHz Left Behind, posted at <http://attpublicpolicy.com/wireless/no-mhz-left-behind>. A copy of that blog posting is also attached.

Sincerely,

/s/ Joseph P. Marx
Assistant Vice President, AT&T Services Inc.

cc: (via e-mail)
Louis Peraetz



No MHz Left Behind

Posted by: Joan Marsh on March 23, 2012 at 11:25 am

Rick Kaplan, the FCC's Wireless Bureau Chief, could not have been more correct when he declared his mission at this week's open meeting to be "no MHz left behind." Given the scarcity of available spectrum – and the challenges the FCC is facing trying to free up new spectrum for mobile Internet use – ensuring that all licensed spectrum is fully and efficiently deployable is essential.

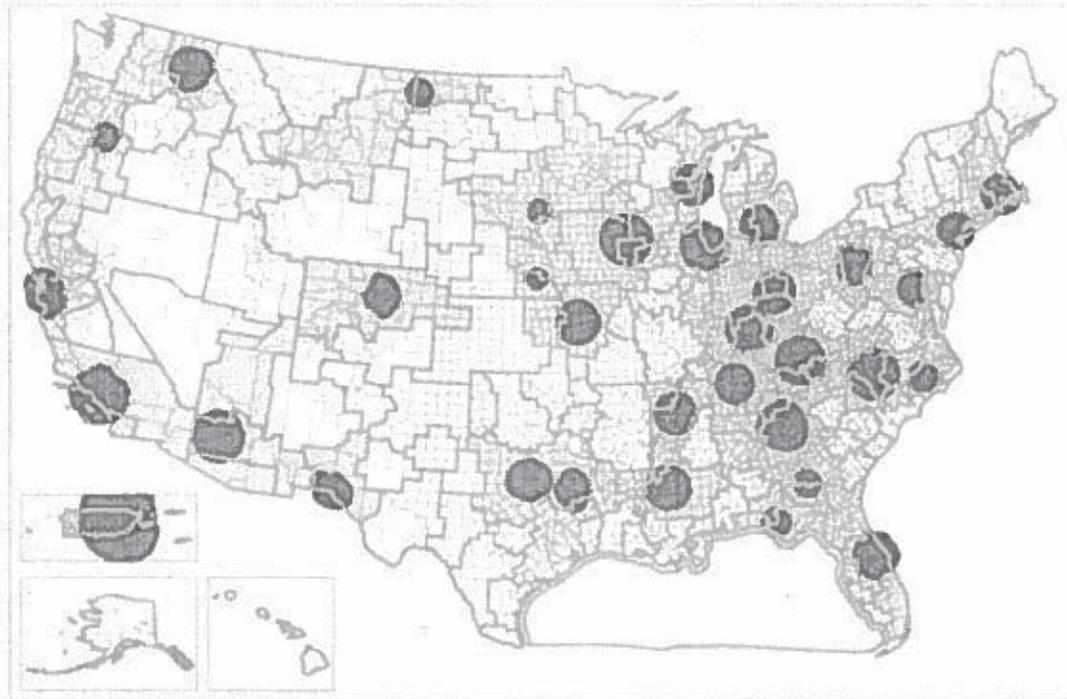
At this week's Open Meeting, the FCC opened a proceeding to explore solutions for interoperability in the lower 700 MHz band. Some have and will continue to focus on only the narrow question of the use of two band classes in the lower band and whether the FCC should require the use of a single band class. These entities would like the FCC to simply ignore the significant interference challenges that led the 3GPP standards-setting body to create two band classes in the first place.

But, contrary to what some carriers claim, it is not the existence of two band classes that is preventing lower A-block deployment. Band Class 12 chipsets are available. US Cellular has announced the rollout of its 4G LTE network in the lower 700 MHz band and its first two LTE devices – a Samsung Galaxy smartphone and tablet. And they promise that more devices will be rolled out this year. C-Spire is also expected to proceed this year with its A-block LTE deployment.

The far bigger deployment challenge in the Lower 700 MHz band is one that few folks have wanted to talk about. The hard fact is that current FCC rules flat out prohibit 700 MHz A-block deployment in more than 30 markets across the country, including New York City, San Francisco and Chicago – markets where additional spectrum and network capacity are the most urgently needed. These deployment holes, or "exclusion zones," are the product of FCC rules that prohibit the operation of 700 MHz A-block devices in the areas where there are over-the-air Channel 51 broadcast signals. The map below shows in red the contours of the broadcast signals for current Channel 51 licensees with an overlay of EA market boundaries for the A-block licenses impacted. These broadcast areas create a patchwork of holes across the nation where A-block deployment will continue to be prohibited until the regulatory challenges of the lower 700 MHz band are fully confronted and resolved.

AT&T is committed to the search for real solutions that will allow full deployment of the 700 MHz lower A-block. Full deployment in the lower 700 MHz band will not be achieved without addressing this challenge. No MHz left behind will be our battle cry as well.

DTV Channel 51 Contours
EA Market Boundary Overlay & EAs Impacted



Attachment 3



Joan Marsh
Vice President –
Federal Regulatory

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December 22, 2011

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th 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 read 'Joan Marsh', with 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.