**Sprint Nextel**
900 7th Street, NW
Suite 700
Washington, DC 20001

**Trey Hanbury**
Director, Government Affairs
Trey.Hanbury@sprint.com
(703) 433-8525

July 24, 2012

***Via Electronic Filing***

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, DC 20554

**Re:** ***Ex Parte Presentation***
*Service Rules for Advanced Wireless Services in the 2000-2020 MHz and 2180-2200 MHz Bands,* WT Docket No. 12-70; *Fixed and Mobile Services in the Mobile Satellite Service Bands at 1525-1559 MHz and 1626.5-1660.5 MHz, 1610-1626.5 MHz and 2483.5-2500 MHz, 2000-2020 MHz and 2180-2200 MHz*, ET Docket No. 10-142; *Service Rules for Advanced Wireless Services in the 1915-1920 MHz, 1995-2000 MHz, 2020-2025 MHz and 2175-2180 MHz Bands*, WT Docket No. 04-356.

Dear Ms. Dortch,

On July 20, 2012, Keith Cowan, President of Strategy and Corporate Initiatives; Larry Krevor, Vice President, Government Affairs; and Trey Hanbury, Director, Government Affairs of Sprint Nextel Corporation ("Sprint"), held a series of meetings at the Commission, including meetings with Commissioner Jessica Rosenworcel, David Goldman, Senior Legal Advisor for Commissioner Rosenworcel, and Paul Murray, Acting Legal Advisor for Commissioner Rosenworcel; Commissioner Ajit Pai and his Legal Advisor Courtney Reinhard; Zachary Katz, Charles Mathias, and Renee Wentzel of the Office of the Chairman; Ruth Milkman, Jeremy Marcus, Kevin Holmes and Melissa Tye of the Wireless Telecommunications Bureau; and, finally, Gardner Foster of the International Bureau, Julie Knapp of the Office of Engineering and Technology and John Leibovitz and Jeremy Marcus of the Wireless Telecommunications Bureau.

Sprint explained that given the relative limited amount of spectrum likely to be made available in the next three years, the company supports the near-term introduction of additional spectrum into the wireless ecosystem. While Sprint therefore supports DISH's request for additional flexibility to introduce terrestrial mobile services in its mobile-satellite service spectrum, Sprint opposes needlessly sacrificing the valuable H Block spectrum to achieve this goal. The H Block is a paired, ten-megahertz block of spectrum that is immediately adjacent to the nationwide PCS G Block where Sprint is deploying its nationwide LTE network. Of the limited spectrum allocations available in the United States, only the PCS H Block is entirely cleared of incumbents, paired as expansion spectrum with the core PCS band, and available for immediate wireless broadband use. Under recently enacted legislation, moreover, Congress has directed the FCC to auction the H Block by no later than 2015 unless the spectrum causes harmful interference to PCS licensees such as Sprint, Verizon, and AT&T.

The Commission allocated the H Block for terrestrial broadband use in September 2004, but has not yet assigned the license through competitive bidding. Sprint encouraged the Commission to

conclude the H Block service-rules proceeding and briefly reviewed key findings and arguments in that docket, including the limited and highly probabilistic prospects for harmful interference into PCS. Specifically Sprint explained how in the uplink band at 1915-1920 MHz, full-power operations across the entire five-megahertz uplink could result in harmful intermodulation interference to PCS B Block receivers that use the CDMA air interface, such as those of Sprint and Verizon. To prevent intermodulation interference, Sprint and Verizon long ago submitted a joint proposal for power limitations in the uppermost portion of the 1915-1920 MHz mobile transmit band that greatly reduce the likelihood of interference to CDMA mobile receivers. While these H Block uplink constraints might limit utility of the uplink spectrum somewhat, reduced auction prices would readily account for this reduction in utility.

In the downlink band at 1995-2000 MHz, meanwhile, Sprint noted that, with the H Block allocated for terrestrial mobile use for nearly eight years, the potential for uplink-downlink interference at the 2000 MHz band edge hardly poses a new or novel constraint on mobile-satellite service and associated operations above 2000 MHz. More importantly, the potential uplink-downlink interference can, as many commenters in this proceeding have observed, be managed in a variety of ways. Whichever interference-mitigation measures the Commission chooses to adopt, Sprint recommended that the Commission finalize its service rules for the PCS H Block and the nearby J Block, auction the spectrum through competitive bidding, and allow the license winners to quickly deploy the idle spectrum for mobile broadband use. Competitive bidding for this valuable wireless broadband spectrum achieves numerous public policy benefits, including quickly introducing additional spectrum into the wireless broadband ecosystem, ensuring timely reimbursement of the approximately $190 million in clearing costs owed to Sprint as a result of Sprint's having relocated broadcast auxiliary incumbents from the band, and the generation of auction revenue for the United States Treasury.

Pursuant to Section 1.1206 of the Commission's rules, this letter is being electronically filed with your office. Please let me know if you have any questions regarding this filing.

Respectfully submitted,

*/s/ Trey Hanbury*
Trey Hanbury

cc: Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
David Goldman
Paul Murray
Courtney Reinhard
Zachary Katz
Charles Mathias
Renee Wentzel
Ruth Milkman
Jeremy Marcus
Kevin Holmes
Melissa Tye

Gardner Foster
Julie Knapp
John Leibovitz