

March 14, 2013

**VIA ELECTRONIC DELIVERY**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Room TWA325  
Washington, DC 20554

**Re: Notice of *Ex Parte* Presentations  
WT Docket No. 12-69**

Dear Ms. Dortch:

On March 12, 2013, Scott Wills, Paul Kolodzy, and Michele Farquhar, representing Vulcan Wireless LLC (“Vulcan”), met with (1) Renee Gregory, Legal Advisor to Chairman Genachowski, and (2) Erin McGrath, Legal Advisor to Commissioner McDowell, to discuss issues related to the above captioned proceeding.

During the meetings, the Vulcan representatives discussed their January 31, 2013 *ex parte* letter to the Commission,<sup>1</sup> highlighting the minimal costs of implementing an interoperability solution based on consultations with several engineering consultants, network engineers, and chipset consultants. They also noted the fallacy of AT&T’s “fall back” argument, noting that: (1) greenfield operators such as Vulcan have no legacy 2G or 3G systems and can source devices to support either or both GSM and CDMA technologies, and (2) the advent of multi-technology chipsets, such as Qualcomm’s recently announced RF 360, will benefit all Lower A Block licensees, regardless of which air interface technology they employ (including CDMA operators). In addition, they addressed the problems stemming from the current uncertainty surrounding this issue, including the impact on Vulcan’s ability to enter partnerships, choose technologies, and make business decisions. In the meeting with Erin McGrath, Vulcan also briefly reviewed its previous presentation regarding interoperability in the Lower 700 MHz band filed in August 2012.<sup>2</sup>

Pursuant to Section 1.206(b) of the Commission’s rules, I am filing this notice electronically in the above-referenced docket. Please contact me directly with any questions.

Respectfully submitted

*/s/ Michele C. Farquhar*

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<sup>1</sup> See *Ex Parte* Letter of Vulcan Wireless LLC to Marlene H. Dortch, Secretary, Federal Communications Commission, WT Docket No. 12-69 (filed Jan. 31, 2013).

<sup>2</sup> See *Ex Parte* Presentation of Vulcan Wireless LLC, WT Docket No. 12-69 (filed Aug. 9, 2012).

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cc: Renee Gregory  
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