



Competitive Carriers Association  
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Competitive Carriers Association  
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April 22, 2013

**Via ECFS**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

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

Dear Ms. Dortch:

Qualcomm recently released a product it calls “RF360 Front End Solution,” which, according to Qualcomm, offers “a comprehensive, system-level solution that addresses cellular radio frequency band fragmentation.”<sup>1</sup> Shortly after the announcement of this technology, CCA filed an *ex parte* letter with the Commission explaining that this product announcement removes any uncertainty surrounding the feasibility for manufacturers to design cost-effective equipment capable of interoperability and shows that interoperable equipment is cost-effective and beneficial.<sup>2</sup> In response, instead of addressing the feasibility, pricing and consumer benefits of the RF360 multi-band front end, Qualcomm revisited false and long-settled allegations of harmful interference in the Lower 700 MHz block.<sup>3</sup>

Having claimed interference is an issue, Qualcomm reasons that since Qualcomm’s new RF360 product has no role in interference management, the RF360 product must be irrelevant to this proceeding. However, CCA never claimed that the RF360 device had anything to do with interference or interference mitigation. CCA’s point in citing the RF360 was to show that, at least outside of this docket, Qualcomm’s product proves that interoperability is (1) feasible, (2) cost-effective, and (3) beneficial.

Even if interference were relevant to the feasibility, cost effectiveness and benefits of interoperability that the RF360 product demonstrates, advocates for interoperability have conclusively disproven interference allegations through multiple laboratory and field studies.<sup>4</sup> All data in the record,

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<sup>1</sup> Qualcomm, Press Release, *Qualcomm RF360 Front End Solution Enables Single Global LTE Design for Next-Generation Mobile Devices* (Feb. 21, 2013) (“Press Release”), <http://xrl.us/bot3m5>.

<sup>2</sup> *Ex Parte* Letter of Competitive Carriers Association to M. Dortch, Promoting Interoperability in the 700 MHz Commercial Spectrum, WT Docket No. 12-69 (Feb. 26, 2013).

<sup>3</sup> Letter of Qualcomm Incorporated to M. Dortch, Promoting Interoperability in the 700 MHz Commercial Spectrum, WT Docket No. 12-69 (Mar. 22, 2013).

<sup>4</sup> See Hyslop & Kolodzy, Lower 700 MHz Test Report: Laboratory and Field Testing of LTE Performance Near Lower E Block and Channel 51 Broadcast Stations (Apr. 11, 2012) (“Hyslop & Kolodzy Independent Study”) (attached to Notice of Ex Parte Presentations by Cavalier Wireless, C. Spire Wireless, Continuum 700 LLC, King

for example, shows that the E Block would not cause interference to Band 12 devices operating in the Lower B and C Block.<sup>5</sup> And third-party laboratory and field studies have demonstrated how LTE performance would remain unaffected by Channel 51.<sup>6</sup>

As Qualcomm's RF360 product shows, the challenge with interoperability is not one of feasibility, cost-effectiveness, or benefits to consumers, but one of market power. Restoring interoperability to the Lower 700 MHz band corrects this market failure. The Commission should restore interoperability to the Lower 700 MHz band without delay.

Sincerely,

/s/

Rebecca Murphy Thompson  
General Counsel

cc (via email): Ms. Ruth Milkman  
Mr. Zachary Katz  
Ms. Renee Gregory  
Mr. James Schlichting

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Street Wireless, L.P., MetroPCS Commc'ns, Inc., U.S. Cellular, and Vulcan Wireless, WT Docket No. 12-69 (May 29, 2012)), *available at* <http://tinyurl.com/cm7djth>; Reply Comments of V-Comm, L.L.C., Prepared on behalf of Cavalier Wireless, Continuum 700, King Street Wireless, MetroPCS Communications, Inc., Vulcan Wireless LLC, WT Docket No. 12-69 (July 13, 2012) ("V-Comm Independent Study"), *available at* <http://tinyurl.com/c29qb3o>.

<sup>5</sup> See Hyslop & Kolodzy Independent Study; V-Comm Independent Study.

<sup>6</sup> See Hyslop & Kolodzy Independent Study; V-Comm Independent Study.