



601 Pennsylvania Ave. NW  
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April 26, 2013

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Room TW-A325  
Washington, DC 20554

Re: ***Ex Parte Notice***

*Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, GN Docket No. 12-268*

Dear Ms. Dortch

In an *ex parte* presentation to Commission staff April 15, 2013, T-Mobile explained the conditions under which television and wireless broadband operations can co-exist.<sup>1</sup> The analysis focused on the 600 MHz uplink band and discussed strategies to resolve or mitigate any potential interference. As noted on slide 14, the analysis assumed that co-channel wireless broadband operations would not be permitted within a television station's service contour.

T-Mobile takes this opportunity to provide additional information concerning slides 15, 16 and 17. Slide 15 described two co-existence scenarios for "co-channel, adjoining geographic regions." Co-channel operations were not contemplated in the same geographic area due to the potential for interference (1) from television transmitters to base station receivers and (2) from wireless broadband user equipment to television receivers. Thus in slide 15, "Market A" represented the service area of the cellular base station and "Market B" represented the service area of the co-channel television broadcast station in a neighboring geographic area. Since the two markets were in adjoining areas, no overlap in geographic coverage was implied. Similarly, slide 16 referred to a set of mitigation techniques advocated by the European Conference of Postal and Telecommunications Administrations (CEPT) that can substantially decrease the geographic separation distances to guard against interference from television transmitters to

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<sup>1</sup> See T-Mobile USA, Inc. *Ex Parte* Presentation, GN Docket No. 12-268 (filed Apr. 17, 2013).

wireless broadband base stations.<sup>2</sup> Again, wireless base stations would need to operate outside the television station's contour to avoid the potential for harmful interference from operating within the same geographic area on a co-channel basis. Finally, slide 17 described the limited nature of the potential for wireless broadband user equipment to cause harmful interference to a television receiver. Here too, the analysis implied that there would be no co-channel operation of the wireless broadband user equipment within the television station's contour. Furthermore, the statement that the handset must be within meters of the television receiver to cause interference applies only to non-co-channel transmissions.

Consistent with section 1.1206 of the Commission's rules, please associate this letter with the above-referenced docket.

Respectfully submitted,

/s/ Kathleen O'Brien Ham

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<sup>2</sup> *Id.* (citing European Conference of Postal and Telecommunications Administrations (CEPT), Report 22B, at 14-15 (July 6, 2007), available at <http://www.erodocdb.dk/docs/doc98/official/pdf/CEPTRep022.pdf>).