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June 11, 2013

Ex Parte

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

Re: <u>Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, GN Docket No. 12-268</u>

Dear Ms. Dortch:

On June 10, 2013, Kathleen Grillo, Charla Rath and I met with Louis Peraertz, Legal Advisor to Chairwoman Clyburn.

We expressed support for the "Down from Channel 51" band plan proposal, which locates paired uplink spectrum adjacent to the 700 MHz block, incorporates a duplex gap that is no larger than is technically necessary, and locates downlink operations on the other side of the duplex gap. We urged the FCC to maximize the amount and utility of spectrum repurposed for mobile broadband and stated our support for market variability.

We discussed the attached slides, which outline two alternative families of band plans that the FCC could implement depending on the amount of spectrum cleared. For higher clearing scenarios in which at least 84 MHz clears nationwide, we recommended a 35x35 approach. For a lower-clearing scenario, we suggested a 25x25 plan. We discussed the benefits of our band plan over other proposals, including enhanced antenna efficiency, maximized paired spectrum and reduced interference. We stated our concerns with both the "Down from 51 Reversed" approach, which would require the placement of extra guard bands in the band and would not avoid co-channel interference issues, as well as the TDD proposal, which similarly would not avoid co-channel interference issues and which suffers from various well-documented drawbacks, including the need for an unprecedented amount of coordination between carriers.

Sincerely,

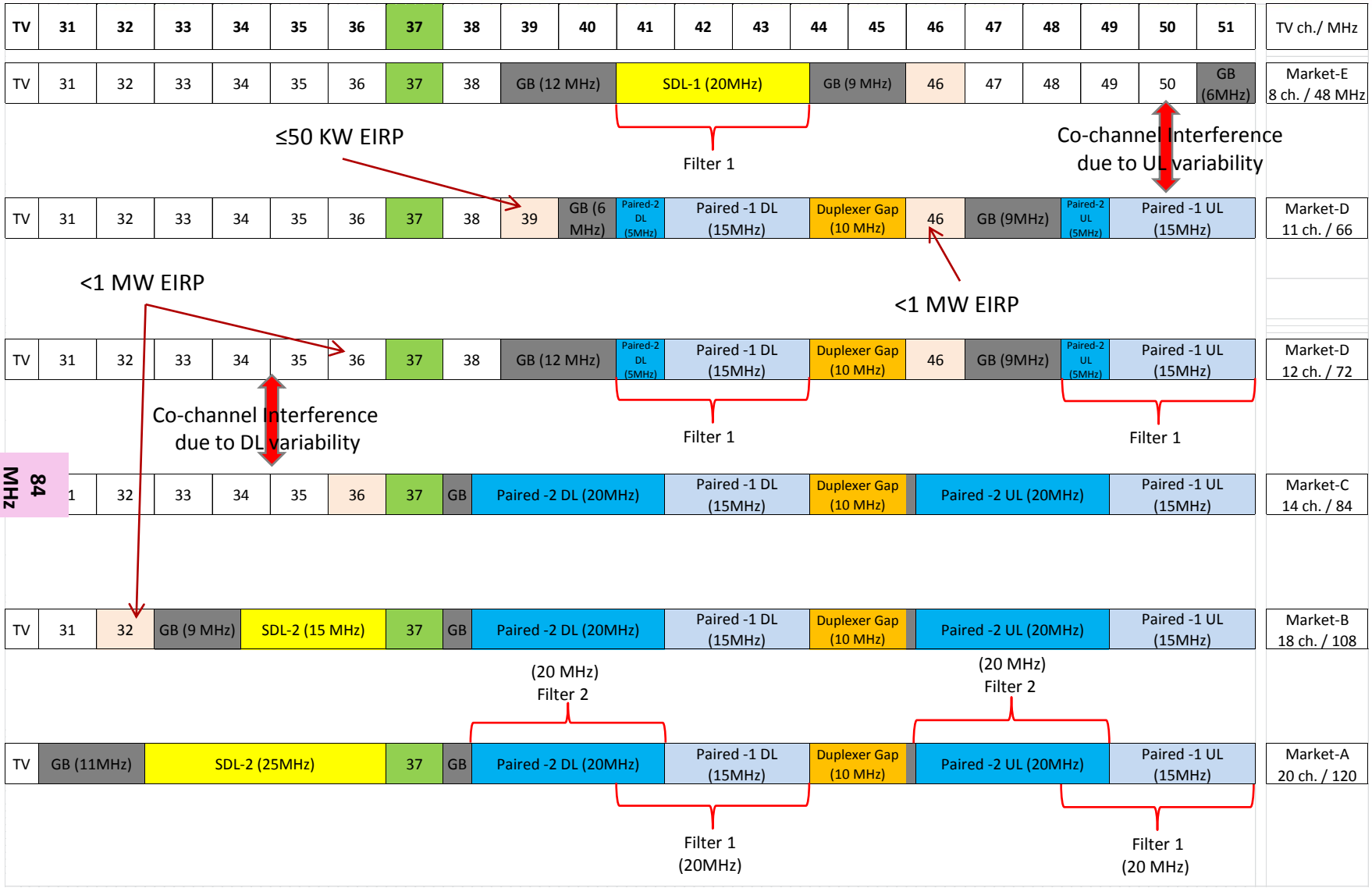
Attachment

600MHz Incentive Auction Band Plan Discussion

June 7, 2013

Network Technology and Strategy
Corporate Technology

Higher Clearance Scenario Band Plan
35x35MHz Two FDD pairs
(with Overlapping Filters)



Lower Clearing Scenario Band Plan
25x25 MHz FDD Pair
(One Filter)

≤50 KW EIRP

TV	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	TV ch./ MHz
TV	31	32	33	34	35	36	37	38	39	40	GB (6 MHz)	SDL-1 (25MHz)				GB (11MHz)		48	49	50	GB (6MHz)	Market-G 8 ch. / 48 MHz
TV	31	32	33	34	35	36	37	38	39	GB (12MHz)		SDL-1 (25MHz)				GB (11MHz)		48	49	50	GB (6MHz)	Market-F 9 ch. / 54 MHz
TV	31	32	33	34	35	36	37	38	39	40	GB (6 MHz)		Paired DL (20MHz)			Duplexer Gap (10 MHz)	GB (5MHz)	Paired UL (20MHz)				Market-E 11 ch. / 66
72 MHz BASE		32	33	34	35	36	37	38	39	GB (12MHz)		Paired-1 DL (25MHz)				Duplexer Gap (10 MHz)		Paired-1 UL (25MHz)				Market-D 12 ch. / 72
TV	31	32	33	34	35	36	37	GB	SDL-2 (20MHz)			Paired-1 DL (25MHz)				Duplexer Gap (10 MHz)		Paired-1 UL (25MHz)				Market-C 14 ch. / 84
TV	31	32	GB (9 MHz)	SDL-2 (15 MHz)			37	GB	SDL-2 (20MHz)			Paired-1 DL (25MHz)				Duplexer Gap (10 MHz)		Paired-1 UL (25MHz)				Market-B 18 ch. / 108
TV	GB (11MHz)		SDL-3 (25MHz)				37	GB	SDL-2 (20MHz)			Paired-1 DL (25MHz)				Duplexer Gap (10 MHz)		Paired-1 UL (25MHz)				Market-A 20 ch. / 120

Filter 1 (25MHz)

Filter 1 (25MHz)

<1 MW EIRP