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VIA Electronic Filing

June 13, 2013

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

Re: In the Matter of Promoting Interoperability in the 700 MHz
Commercial Spectrum, WT Docket No. 12-69;
Policies Regarding Mobile Spectrum Holdings; WT Docket No. 12-269;
Comments Sought on the Technological Transition of the Nations
Communications Infrastructure; GN Docket No. 12-353; and
Technology Transitions Policy Task Force; GM Docket No. 13-5

Dear Ms. Dortch:

On Tuesday, June 11, 2013, Randall Stephenson, Chairman and CEO of AT&T, Jim Cicconi, Executive Senior Vice President, External and Regulatory Affairs, and Robert Quinn, Senior Vice President-Federal Regulatory and Chief Privacy Officer attended a meeting with Commissioner Jessica Rosenworcel and David Goldman, her Senior Legal Advisor.

At the meeting, they discussed appropriate spectrum policies for the United States and the importance of moving forward on the incentive auction proceeding. They explained that the auction framework should be designed to maximize broadcaster participation and the importance of a fair process that encourages full participation at auction by all carriers. Mr. Stephenson also discussed the importance of efficient review by the Commission of secondary market transactions.

They further discussed the importance of network modernization and why geographic trials have to be a necessary component of any transition in order to operationalize the process throughout AT&T's footprint. Mr. Stephenson encouraged the Commission to move forward on AT&T's request to initiate industry-wide trials as soon as practicable.

Finally, they discussed the arguments raised by certain parties in the above-captioned proceeding that the Commission should require AT&T to support Band 12 in its devices and network. They explained that such an unprecedented intervention in the marketplace would undermine the integrity and predictability of the wireless industry's standards-setting process, retard broadband investment and deployment, threaten the reliability of existing LTE services, expose millions of consumers to additional interference risk, and do very little to resolve the interoperability and interference challenges that threaten deployment in the 700 MHz A block.

They also noted that, while the record does not support a Band 12 mandate, there is broad agreement among the parties that the public interest would be served by prompt Commission action to phase out high-powered Channel 51 and E Block broadcasts that are incompatible with efficient use of Lower 700 MHz spectrum. Strong Commission leadership in these areas will bring immense benefits, including increased spectrum capacity and accelerated broadband investment, and would resolve the interoperability challenges without the need for a regulatory mandate.

In accordance with Commission rules, this letter is being filed electronically with your office for inclusion in the public record.

Sincerely,

A handwritten signature in black ink, appearing to be 'JM', followed by a horizontal line extending to the right.

Joan Marsh

cc: Commissioner Jessica Rosenworcel
David Goldman