

Trey Hanbury
Partner
T: 202.637.5534
trey.hanbury@hoganlovells.com

September 23, 2013

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Re: *Ex Parte Notice*

Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, GN Docket No. 12-268;
Policies Regarding Mobile Spectrum Holdings, WT Docket No. 12-269

Dear Ms. Dortch:

On September 19, 2013, Kathleen Ham, Chris Wieczorek, Steve Sharkey, Michael Amend, and Karri Kuoppamaki of T-Mobile USA, Inc.¹ (“T-Mobile”), Kenneth Zdunek, a consultant for T-Mobile, and Trey Hanbury of Hogan Lovells US LLP (counsel to T-Mobile), met with Matthew Hussey and Robert Weller of the Office of Engineering and Technology, Chris Helzer, John Leibovitz, and Tom Peters of the Wireless Telecommunications Bureau, John Williams and Evan Kwerel of the Office of Strategic Planning and Policy Analysis, and Gary Epstein and Edward Smith of the Incentive Auctions Task Force to discuss the two attached slide presentations.

The participants first discussed the slides on T-Mobile’s technical evaluation of TD-LTE for low-band spectrum. T-Mobile’s representatives explained that deploying TD-LTE at 600 MHz will result in both efficiency losses and operational deficiencies. TD-LTE in low-frequency spectrum has link budget deficits and performance constraints compared to FDD LTE as well as real-world limitations on the feasibility of variable downlink-uplink configurations. TD-LTE may function as an alternative for supplemental downlink spectrum, but guard band requirements must be considered in that scenario.

The participants next considered the slide presentation regarding market variability. T-Mobile’s representatives urged the Commission to take into consideration terrain topology and morphology when setting exclusion zones. Using Seattle as an example, T-Mobile illustrated

¹ T-Mobile USA, Inc. is a wholly-owned subsidiary of T-Mobile US, Inc., a publicly traded company.

that failing to account for the surrounding mountains that block transmissions would result in larger exclusion zones than required to protect wireless broadband services in adjacent markets from harmful interference.

Pursuant to Section 1.1206(b)(2) of the Commission's rules, an electronic copy of this letter is being filed for inclusion in the above-referenced dockets.

Respectfully submitted,

/s/ Trey Hanbury

Trey Hanbury
Counsel to T-Mobile USA, Inc.

Attachment A

Attachment B

cc: Matthew Hussey
Robert Weller
Chris Helzer
John Leibovitz
Tom Peters
John Williams
Evan Kwerel
Gary Epstein
Edward Smith