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December 17, 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, GN Docket No. 12-269

Dear Ms. Dortch:

On December 13, 2013, Kathleen Ham, Steve Sharkey, Chris Wieczorek from T-Mobile USA, Inc. ("T-Mobile")[1] and Trey Hanbury of Hogan Lovells US LLP (counsel to T-Mobile) met with Gary Epstein and Edward Smith of the Incentive Auction Task Force; Chris Helzer, John Leibovitz, and Sasha Javid of the Wireless Telecommunications Bureau; Julius Knapp, Matthew Hussey, Robert Weller, and Mark J. Colombo of the Office of Engineering and Technology; and William Lake of the Media Bureau to discuss the attached slide presentation. Ken Zdunek, Mike Needham, and John Huag of the technical consulting firm Roberson and Associates participated in the conversation by telephone.

The participants reviewed an analysis of co- and adjacent channel effects for variable and impaired markets as well as an analysis of the potential for repacking and the ability to make spectrum available in a number of key markets, even in the presence of variable levels of market clearing.

T-Mobile's co-channel analysis examined approximately 10,000 cell sites and 18 television stations in and around New York in a total of 19 Economic Areas ("EAs"). While the T-Mobile analysis indicates that most broadband LTE cell sites in the New York EA would experience interference from in-market television stations, LTE cell sites outside of the New York EA

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

would exhibit considerably less interference. Indeed, most markets outside of the New York EA would be largely or entirely unimpaired as a result of co-channel television operations inside the New York EA. Specific impairment levels as calculated on a site-by-site basis vary depending on location, height above ground level, and other factors and have been categorized as indicated in the slide presentation.

The study T-Mobile prepared has limitations. For example, T-Mobile used its own cell site locations and parameters in performing its site-by-site interference analysis. Other types of LTE network data, such as a "randomized real network laydown" contemplated by working groups of the Commerce Spectrum Management Advisory Committee ("CSMAC"), might be a proxy the FCC could use to compare TV station to LTE base station interference scenarios.[2] Regardless of the approach chosen, the study indicates that broadband LTE operations could operate in the presence of co-channel, over-the-air television operations in geographically nearby market areas, even in a region as densely populated as the northeastern United States when sufficient terrain and distance separation exists.

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 docket.

Respectfully submitted,

/s/ Trey Hanbury

Trey Hanbury
Counsel to T-Mobile USA, Inc.

Attachment A

cc: Gary Epstein
Edward Smith
Chris Helzer
John Leibovitz
Sasha Javid
Julius Knapp
Matthew Hussey
Robert Weller
Mark J. Colombo
William Lake

[2] To avoid concerns about confidentiality or security, CSMAC participants have modeled network infrastructure based on a "randomized real network laydown," which consists of a carrier's actual nationwide base station locations that are shifted random distances by a small amount in a random direction.