



QUALCOMM Incorporated

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August 29, 2014

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

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

Dear Ms. Dortch:

On August 28, 2014, Dean Brenner, Sumit Verma, Kent Walker, and the undersigned of QUALCOMM Incorporated (“Qualcomm”) discussed the filing that Qualcomm made in the above-referenced docket on August 5, 2014, with the following FCC staff: Gary Epstein, Howard Symons, AJ Glusman, Chris Helzer, Matthew Hussey, Ira Keltz, Julius Knapp, John Leibovitz, and Serey Thai.

Qualcomm explained that permitting unlicensed services within the duplex gap or guard bands in the 600 MHz mobile broadband band plan at the transmit power levels proposed by Broadcom will impair the adjacent mobile spectrum blocks and destroy the fungibility of the licensed mobile spectrum that the FCC is working to repurpose through the upcoming voluntary incentive auction.

Respectfully submitted,

**John W. Kuzin**

John W. Kuzin

Senior Director, Government Affairs – Regulatory

cc (via email) Gary Epstein  
Howard Symons  
AJ Glusman  
Chris Helzer  
Matthew Hussey  
Ira Keltz  
Julius Knapp  
John Leibovitz  
Serey Thai