

July 6, 2015

VIA ELECTRONIC FILING

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

Re: *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions* (GN Docket No. 12-268); *Office of Engineering and Technology Releases and Seeks Comment on Updated OET-69 Software* (ET Docket No. 13-26); *Office of Engineering and Technology Seeks to Supplement the Incentive Auction Proceeding Record Regarding Potential Interference Between Broadcast Television and Wireless Services* (ET Docket No. 14-14); *Comment Sought on Defining Commencement of Operations in the 600 MHz Band* (GN Docket No. 12-268)

Dear Ms. Dortch,

On Wednesday, July 1, 2015, CTIA – The Wireless Association® (“CTIA”) and its members met with representatives from the Incentive Auction Task Force (“IATF”), the Wireless Telecommunications Bureau (“WTB”), the Office of Engineering and Technology (“OET”), the Media Bureau (“MB”), and the Office of General Counsel (“OGC”) to discuss the above referenced proceedings. A list of attendees and a copy of the presentation discussed are included as attachments to this *ex parte* filing.

In this meeting, CTIA explained that the incentive auction represents the only opportunity for the foreseeable future to bid for access to much-needed spectrum for mobile broadband use and noted the importance of creating rules for access to licensed spectrum and inter-service interference that promote certainty and investment in order to achieve the spectrum clearing goals of Congress in the 2012 Spectrum Act. CTIA also stressed that the Commission should adopt frameworks that speed deployment and promote bidder confidence. For example, 600 MHz licensees should be permitted to conduct pre-deployment testing of licensed spectrum without any encumbrances from secondary users of the spectrum as soon as possible and should not be required to provide ongoing notifications to secondary operations once a licensee has initiated transmissions.

Additionally, CTIA asked that the Commission clarify the scope of the requirements affecting 600 MHz licensees that would trigger additional inter-service interference analyses and fully disclose any potential impairment associated with this process. For example, 600 MHz licensees should not be required to conduct extensive analyses of interference effects if proposed mobile network modifications would not increase the interference potential to a broadcast station. Finally, CTIA asked that the Commission engage with potential forward auction participants in an iterative, collaborative process to make sure that these affected stakeholders

will be able to analyze and understand the complicated data to be provided to them during the incentive auction.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed in ECFS. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ Scott K. Bergmann

Scott K. Bergmann
Vice President, Regulatory Affairs
CTIA-The Wireless Association®

Attachment
July 1, 2015 Meeting Participants

CTIA – The Wireless Association®

Scott Bergmann, Vice President, Regulatory Affairs, CTIA
Brian Josef, Assistant Vice President, Regulatory Affairs, CTIA
Krista Witanowski, Assistant Vice President, Regulatory Affairs, CTIA
Kara Romagnino, Director, Regulatory Affairs, CTIA
Thomas Dombrowsky, Senior Engineering Advisor, Wiley Rein LLP (for CTIA)

CTIA Member Company Representatives

Brian Benison, AT&T
Richard Engelman, Sprint
Chris Wieczorek, T-Mobile
Leighton Brown, Holland & Knight (for US Cellular)
Leora Hochstein, Verizon

Federal Communications Commission – Incentive Auction Task Force

Gary Epstein
Howard Symons

Federal Communications Commission – Office of Engineering and Technology

Julius Knapp
Ira Keltz
Geraldine Matise
Paul Murray
Matthew Hussey
Alan Stilwell
Martin Doczkat
Barbara Pavon
Aspasia Paroutsas

Federal Communications Commission – Wireless Telecommunications Bureau

Blaise Scinto
Sandra Danner
Simon Banyai

Federal Communications Commission – Media Bureau

Michelle Carey

Federal Communications Commission – Office of General Counsel

Bill Scher

Commencement of Operations and Inter-service Interference in the 600 MHz Band

**GN Docket No. 12-268
ET Docket Nos. 13-26 and 14-14**

July 1, 2015

Overview

- The Commission Should Adopt a Framework for Wireless Licensee Access to Spectrum That Speeds Deployment and Maximizes Bidder Confidence.
 - The Commission should tie the definition of commence operations to the initial transmission on licensed spectrum.
 - 600 MHz licensees should only be required to notify parties of commencement of operations a single time for their licensed service area.
- The ISIX Framework Should Not Impose Unnecessary Burdens on Wireless Licensees.
 - Forward auction participants should be provided with complete information regarding potential inter-service interference and license impairments, using the most granular data available.
 - Licenses should be disclosed as impaired if inter-service interference analyses are required to be conducted.
 - The requirement for interference analyses by 600 MHz licensees should be appropriately tailored.

600 MHz Licensees Must Have the Flexibility To Test And Deploy

- The Commission's Rules Should Reflect 600 MHz Licensees' Considerable Investment and Primary Usage Rights.
 - Wireless providers will be required to make substantial investments during the forward auction to obtain primary usage rights in the 600 MHz band.
 - These licensees should be able to access their licensed spectrum free from impediments, without unnecessary procedural burdens or processes.
- The Initial Transmission on Licensed Spectrum Should Serve as Commencement of Operations.
 - Prior to initiating commercial services to customers, wireless providers conduct extensive pre-deployment testing.
 - This testing allows carriers to collect measurement data to calibrate their propagation models or to test network configuration to respond to impairments from television stations.
 - Secondary operations (including LPTV, TV translators, wireless microphones and white space devices) should be cleared prior to this pre-deployment testing so that the wireless provider is able to test the actual operating environment prior to commercial launch.

Commencement of Operations Should Apply at the PEA Level

- Once a wireless licensee “commences operations” in a portion of a PEA, the band clearing obligations of secondary users should extend throughout the PEA.
- Wireless carriers should only be required to submit a single notice that will apply throughout their licensed area that will require all secondary and/or unlicensed services operating with the PEA to cease operations.
- The Commission should not impose an unprecedented obligation on 600 MHz licensees to continually update their deployment data in order to ensure that they receive the interference protection granted as part of their licenses.

Inter-Service Interference Analyses Should Be Appropriately Tailored

- The NRPM proposes that 600 MHz licensees be required to perform an OET-74 interference analysis prior to deploying a base station.
 - This would be required if a base station is within a set culling distance of a co- or adjacent channel broadcaster.
 - This obligation would also be mandated if any change is made to a base station.
- The Commission should better define the scope of what types of changes to base stations would trigger a new interference analysis.
 - Interference analyses should only be required if the modification would increase the interference potential to a broadcast station.
 - Wireless providers should not be required to perform interference analyses if the base station (or modification) is fully within the coverage area of an already analyzed base station.

Inter-Service Impairments Should Be Fully Disclosed

- The Commission should identify as “impaired” any 600 MHz license that is subject to performing ISIX engineering analyses.
 - The ISIX NPRM contemplates that certain licenses that were not listed as impaired would be subject to conducting engineering analyses post-auction that could lead to impairments in the ability of using the license.
 - Any such obligation must be fully disclosed during the auction.
- The Commission should utilize the $F(50,10)$ statistical measure to predict interference from broadcast stations to wireless operations.
 - The $F(50,10)$ statistical measure is a more accurate reflection of the real-world usability of a spectrum block and the costs associated with addressing impairments.
 - At a minimum, the FCC should provide the information needed by forward auction bidders to determine the $F(50,10)$ statistical measure.