

January 24, 2013

Gary Epstein, Incentive Auction Task Force Chair
Ruth Milkman, Wireless Bureau Chief
Federal Communications Commission
455 12th Street, SW
Washington, DC 20554

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

Dear Gary and Ruth,

The Commission adopted a comprehensive and thoughtful Notice of Proposed Rulemaking (NPRM) on the incentive auction, posing many complex questions for the wireless and TV broadcast industries, particularly with respect to the structure of the band plan. Determining how to organize wireless and TV operations in the 600 MHz band to maximize the amount of spectrum available for mobile broadband services and minimize interference and deployment challenges is indeed a difficult task. We appreciate the Commission's efforts thus far and have carefully reviewed the NPRM's proposals.

While analysis of the band plan and its operational characteristics is ongoing, the parties to this letter have been working together to build consensus where it can be achieved. The product of our deliberations to date is a core set of band plan principles that we recommend the Commission follow in developing the 600 MHz Band Plan.

Generally, the band plan should strive to achieve the following goals: (1) maximize the amount of auctioned spectrum (with a preference for paired) made available through the clearing process; (2) avoid interference to and from licensed wireless and broadcasting services; and (3) enable device performance and size consistent with existing smart phones and tablets.

More specifically, the analysis to date suggests the band plan support the following principles:

- Adopt a contiguous “down from TV 51” approach with uplink at the top;
- Maximize the amount of paired spectrum above TV 37 (rely on supplemental downlink configurations where spectrum is cleared but pairing options are not viable);
- Rely upon 5 MHz spectrum blocks as building blocks for the band plan;
- Incorporate a “duplex gap” or spacing between uplink (mobile transmit) and downlink (base transmit) of a minimum of 10 MHz, but no larger than technically necessary;
- Avoid broadcast television stations in the duplex gap;
- Preclude any operations in the duplex gap or guard bands that would result in harmful interference to adjacent licensed services;
- Provide guard bands that are, consistent with the statute, “no larger than is technically reasonable” to guard against harmful interference between adjacent operations;

- Provide a guard band between a high power broadcaster and mobile downlink that is sufficient to protect the wireless service from interference, which will likely be larger than the 6 MHz proposed by the FCC;
- Permit existing operations in TV 37 to remain;
- Facilitate international harmonization, prioritizing harmonization across North America and move forward expeditiously to coordinate with Canada and Mexico for new broadcast assignments.

These are the band plan principles to which all of the undersigned parties agree. While technical analysis is ongoing and work remains to be done, the parties to this letter plan to continue to collaborate and reach out to others in the wireless and TV broadcast industries to formulate a consensus band plan to the extent feasible. We look forward to those discussions, and to working closely with the Commission to achieve a technically sound band plan consistent with the principles articulated in this letter.

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