

December 8, 2011

**VIA ELECTRONIC DELIVERY**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Room TWA325  
Washington, DC 20554

**Re: Notice of *Ex Parte* Presentation  
WT Docket No. 11-18; RM-11592**

Dear Ms. Dortch:

On December 6, 2011, Vulcan Wireless LLC (“Vulcan”) representative Michele Farquhar spoke by telephone with Louis Peraertz, Legal Advisor to Commissioner Clyburn, to discuss the critical need for a condition on the AT&T-Qualcomm acquisition that would help restore a consolidated Lower 700 MHz band class.

Specifically, the parties discussed the results of a “real world” study, funded by a consortium of several Lower 700 MHz A Block licensees,<sup>1</sup> intended to prove or disprove the unsubstantiated claims previously submitted to the FCC and 3GPP by AT&T and Qualcomm, among others, regarding the need for establishing two separate band classes to govern only three spectrum blocks. As described in more detail in Vulcan’s November 25 *ex parte* in this proceeding, the findings of the study were as follows:

- The underlying assumptions and claims put forth in 3GPP proceedings rationalizing a separate Band Class 17 were incorrect or overstated;
- Different operators’ systems in the Lower 700 MHz B and C Blocks actually pose a threat of interference to each other that is greater than any threat that would be introduced from a unified Lower 700 MHz band class that includes the A Block;
- Neither the high power E Block transmissions nor Channel 51 transmissions present an interference threat to AT&T’s LTE devices, which currently receive and manage signal level disparities from within the B and C Blocks that are greater than those which would need to be accounted for by restoring the original Lower 700 MHz band plan;

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<sup>1</sup> The consortium members include: Vulcan Wireless, King Street Wireless, Cavalier Wireless, Continuum 700, Cox Wireless, C Spire and MetroPCS.

- Concerns about reverse intermodulation distortion interference are unfounded, as commercially deployed AT&T devices did not experience any such interference; and
- The vague and exaggerated concerns regarding the potential increase in cost and/or size of devices necessary to operate on a reunified Lower 700 MHz band plan are without merit, as the cost of devices with such a condition will be virtually unchanged.

Pursuant to Section 1.1206(b) of the Commission's rules, I am filing this notice electronically in the above-referenced docket. Please contact me directly with any questions.

Respectfully submitted,

*/s/ Michele C. Farquhar*

Michele C. Farquhar  
Counsel to Vulcan Wireless LLC

Partner  
michele.farquhar@hoganlovells.com  
D 1+ 202 637 5663

cc: Louis Peraertz