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March 1, 2012

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

Re: WT Docket No. 11-18  
File No. 0004566825  
RM-11592

Dear Madam Secretary:

On behalf of King Street Wireless, L.P. ("King Street"), I write to urge that, as the Commission moves forward on an NPRM regarding interoperability in the referenced docket, it acts as follows:

1. The focus in the proceeding should be on costs and benefits of interoperability itself. Related, but distinct, issues such as Channel 51 should be relegated to lesser consideration in this proceeding.
2. In the two and one-half years since a request for rulemaking on this issue was submitted, many of the arguments in opposition to interoperability have been largely without accompanying support. The Commission should specifically urge that all arguments be provided with detailed technical or economic support.
3. As the request for rulemaking has already been pending for a considerable amount of time, the Commission should strive to complete this rulemaking in Calendar Year 2012.
4. Any transition time period for implementation of interoperability should be brief, and certainly should not extend beyond twelve months after completion of the rulemaking.
5. The Commission should appreciate that technical differences exist between interoperability (a) for the lower 700 MHz band and (b) for both the lower and upper 700

Marlene H. Dortch, Secretary

March 1, 2012

Page 2

MHz band. While it may well elect to move forward regarding each band on a separate time frame, the Commission should move forward on both bands in this proceeding.

6. In assessing the benefits associated with interoperability, the Commission should inquire as to whether competition in the 700 MHz band is even possible without it.

Respectfully submitted,

/s/ Thomas Gutierrez  
Counsel for King Street Wireless, LP