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November 16, 2012

VIA ECFS

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

Re: WT Docket No. 12-240
WT Docket No. 12-69

NOTICE OF ORAL EX PARTE PRESENTATION

Dear Ms. Dortch,

On Wednesday, November 14, 2012, the undersigned met with Ruth Milkman, Chief of the FCC's Wireless Telecommunications Bureau. During the course of the meeting we discussed a variety of issues.

First, I discussed AT&T's plan, announced last week, to invest \$14 Billion over the next three years to expand and enhance its wireless and wireline IP broadband networks to support growing customer demand for high-speed internet access and new mobile and cloud services. More specifically, I discussed AT&T's plans to expand its 4G LTE network to cover 300 million people in the United States by year-end 2014 and its plan to deploy small cell technology, macro cells and additional distributed antenna systems to increase the density of the wireless network, which is expected to further improve network quality and increase spectrum efficiency. We also discussed AT&T's mobile premises solutions, a new nationwide service that provides an alternative to traditional residential wireline voice services.

I further discussed AT&T's continuing efforts through spectrum deals to acquire the wireless spectrum necessary to support our 4G LTE network. I specifically discussed the WCS acquisitions announced by AT&T, which are currently pending before the Commission, and the importance of AT&T's innovative WCS solution to its mobile broadband future. I also noted that the company will continue to support the FCC's effort to reallocate additional spectrum to meet the industry's long-term spectrum needs.

Next we discussed AT&T's position in the pending 700 MHz interoperability proceeding. I argued that the substantial record developed to date demonstrates that the interference challenges in the lower 700 MHz band are real and material. The high

power broadcasts permitted in broadcast TV channel 51 and in the 700 MHz lower E block create the potential for debilitating interference into the lower A and B blocks that could dramatically degrade wireless service. I also argued that a Band 12 mandate would fall far short of solving the real challenges crippling the A block. Namely, among other deficiencies, a mandate would do nothing to eliminate the CH 51 exclusion zones, areas where A block carriers simply cannot deploy. These no-build zones make efficient use of the A block virtually impossible.

I further indicated that AT&T was committed to finding real solutions to the lower A block challenges and we discussed some of the ideas AT&T presented in its opening comments as filed in the proceeding and in a meeting with FCC Staff on August 24, 2012, where AT&T presented a deck entitled “Addressing the Challenges of High Power Broadcasts in Channel 51.”

Finally, I noted that should the Commission decide to make the H Block available at auction, the Commission must adopt power limits and other appropriate protections to prevent harmful interference to current PCS band operations that could be caused by mobile broadband use of the H Block.

In accordance with Commission rules, this letter is being filed electronically with your office for inclusion in the public record.

Sincerely,

A handwritten signature in black ink, appearing to read 'Joan Marsh', with a long horizontal line extending to the right.

Joan Marsh

cc: Ruth Milkman