



February 15, 2008

Via Electronic Filing

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW, TW – A325  
Washington, DC 20554

**Re: WT Docket No. 07-195 – Notification of Oral Ex Parte Presentation**

Dear Ms. Dortch:

On February 14, 2008, Dr. Paul J. Kolodzy, Senior Technology Advisor to M2Z and the undersigned met with Blaise Scinto, Peter Daronco, Martin Liebman, John Spencer, Paul Malmud, Brent Greenfield, and Stephen Zak of the Wireless Telecommunications Bureau. During the meeting, we discussed the record in the AWS-3 proceeding in support of a licensing regime that utilizes technically neutral and flexible rules while protecting the public interest through specific and enforceable licensee obligations.

One area of focus during the discussion was the argument made by some parties that the Commission should prohibit TDD use in the 2155-2175 MHz band because there is no guard band present to protect future AWS-1 operations. As we explained, many of these parties did not raise such objections to TDD use in the 700 MHz band and despite the lack of guard bands in that spectrum instead argued for flexibility. We highlighted that the Commission provided such flexibility in the 700 MHz band by concluding that “technologies using unpaired spectrum can operate on paired segments” and allowed for the “post-auction unpairing of this spectrum.”<sup>1</sup> Thus, rather than unnecessarily prohibiting TDD in the AWS-3 band, we advocated the use of reasonable and neutral technical rules (similar to those being used in Auction 73) in order to manage interference.

Pursuant to Section 1.1206(b) of the Commission rules, an electronic copy of this letter is being filed. Please let me know if you have any questions regarding this submission.

Sincerely,

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

Uzoma Onyeije

<sup>1</sup> See *Service Rules for the 746-764 and 776-794 MHz Bands, and Revisions to Part 27 of the Commission's Rules*, First Report and Order, 15 FCC Rcd 476 ¶ 42 (2000).