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Cellular Telecommunications & Internet Association

January 28, 2003

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
12th Street Lobby, TW-A325
Washington, DC 20554

***Re*: *Ex Parte* Presentation**
IB Docket No. 01-185; ET Docket No. 95-18; ET Docket No. 00-258

Dear Ms. Dortch:

CTIA has previously noted the significant potential for harmful interference resulting from the provision of terrestrial services by MSS licensees. (See, for example, CTIA ex parte letters dated January 23, 2003 and January 24, 2003). Specifically, MSS/ATC phones transmitting in spectrum above 1990 MHz can cause significant interference to PCS phones receiving in the 1930-1990 MHz band. To avoid such harmful interference, CTIA proposed that the Commission establish a strict out-of-band emission ("OOBE") limit for ATC emissions into the PCS receive band and ensure adequate frequency separation between PCS and MSS/ATC services. CTIA has noted that the industry itself adheres to strict OOBE limits that were designed to avoid such interference.[1]

There is considerable support in the record for the establishment of strict emissions limits for MSS/ATC operations – including support from MSS licensees themselves. In previous submissions to the FCC, MSS licensees have noted the significant potential for ATC operations to cause harmful interference to MSS mobile receivers.[2] One licensee, ICO Global Communications, has noted that this interference can be mitigated by establishing internal guard bands to separate MSS and ATC operations and by employing ATC equipment with improved OOBE performance.[3] With regard to OOBE, ICO proposed that the Commission establish an OOBE limit of –119.6

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[1] The TIA standard employs a –61 dBm/MHz limit for GSM and a –81 dBm/MHz limit for CDMA.

[2] See Comments of The Boeing Company, IB Docket No. 01-185, ET Docket No. 95-18 (filed Oct. 19, 2001), at 5-7, 9-10; see also Reply Comments of New ICO Global Communications, IB Docket No. 01-185, ET Docket No. 95-18 (filed Nov. 13, 2001) ("ICO Replies"), at Appendix B.

[3] ICO Replies at Appendix B.

dBW (measured over a 4 kHz bandwidth) for emissions from an ATC mobile user terminal into the MSS mobile receive band.[4] This equates to a level of –65.6 dBm/MHz. ICO concluded that this limit on emissions is necessary to protect MSS mobile receivers from harmful interference caused by ATC mobile transmit operations. Moreover, ICO has noted that it "is confident that ATC transmitters can be designed to meet the emission limits, that the limits will not unduly constrain either the satellite or the terrestrial component of 2 GHz MSS networks, and that the limits will provide sufficient interference protection under any of the ATC architectures proposed by ICO."[5]

We note that the potential for ATC mobiles to interfere with MSS mobiles, as identified by ICO, is comparable to the harmful interference that ATC mobiles would cause to PCS handsets receiving in the 1930-1990 MHz band. Consequently, it would be reasonable to expect that the OOBE limits into the 1930-1990 MHz band from ATC user terminals should be at least as stringent as that proposed by ICO to protect MSS mobiles that receive in the MSS downlink band, and that conformance to this limit would be no less achievable for MSS/ATC operators.

Pursuant to Section 1.1206(b)(2) of the Commission's rules, this letter is being filed electronically. If you have any questions concerning this submission, please contact the undersigned.

Sincerely,

Diane Cornell

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cc: Bryan Tramont
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[4] See Ex Parte Filing of ICO Global Communications, IB Docket No. 01-185, ET Docket No. 95-18 (filed Apr. 10, 2002) ("ICO Ex Parte"), at 2.

[5] Id at 3.