

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

**Re: Ex Parte Presentation
WT Docket No. 03-103; “Air-Ground Telecommunications Services”**

Dear Ms. Dortch:

This letter is being filed in response to the Commission’s Notice of Proposed Rulemaking in which it is reassessing its current rules for the Air-Ground service in the 800 MHz band. The Commission is considering various licensing scenarios that would employ the use of a 2.5 MHz (2 x 1.25 MHz) license block. The information we are providing today addresses the inadequacy of a 2.5 MHz channel and the need for a larger block size to accommodate the provision of Orthogonal Frequency Division Multiplexing (“OFDM”) technology.

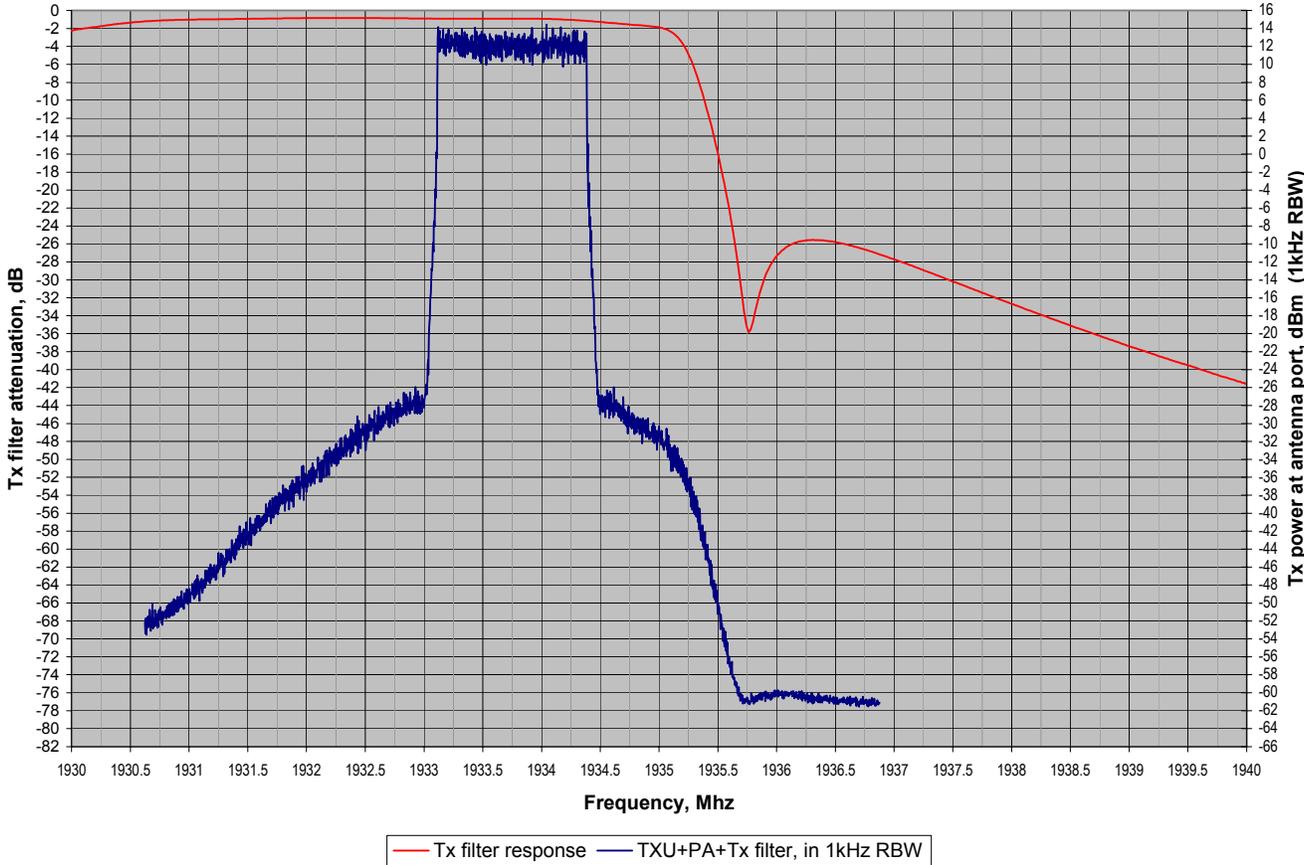
Based on Flarion’s interpretation of FCC requirements, we can meet all FCC requirements with margin of 125 kHz guard band, which is in support of a 1.5 MHz channel allocation, of which 1.25 MHz carries the content and 250 KHz is utilized for the guard band. Our commercial deployment in Raleigh, NC proves that we are capable of being deployed in a 1.5 MHz channel. As can be seen from the test data, all FCC emissions requirements are met in 1.5 MHz channel when using a filter with rejection characteristics like the one used in the Raleigh, NC deployment. The proof and explanation of this is in Figures 1.

Figure 1 shows test data of Flarion carrier at the antenna port (in blue) superimposed on a filter response (in red). As you can see the filter provides significant attenuation at 1 MHz offset from the carrier edge and this helps in meeting the FCC requirements of –13dBm /1 MHz at 1 MHz offset . Within the first MHz from the band edge the FCC requirement is –13 dBm/12.5 kHz, which we meet even without any help from the filter.

Professionally yours,
Michael J. Thornton
Flarion Technologies Inc.

FIGURE 1

Antenna port emission measurement vs. Tx filter response



cc: Richard Arsenault
Julius Knapp

