From: LARRIE SUTLIFF

To: Jose Trevino
Date: August 28, 2007

Subject: FCC file# 0644-EX-ST-2006

Message:

Mr. Trevino,

AT&T and AFTRCC have reached agreement on a process for frequency coordination as described in greater detail in the email exchange below. The agreement consists of a coordination procedure including notification and response.

For your information, with regard to Mr. Holtmeyer's comments regarding experimental use of the band 2385-2390 MHz, AT&T is filing a letter with the Commission requesting that the renewal authorization for WD2XDQ be processed without including this band.

Larrie Sutliff

From: Holtmeyer, Darryl J [mailto:darryl.j.holtmeyer@boeing.com]
Sent: Friday, August 17, 2007 11:33 AM
To: SUTLIFF, LARRIE, ATTLABS
Cc: dhankins@cessna.textron.com; BARNICKEL, DONALD J (DON), ATTLABS; Hart, W. Clark; sutliff@att.net; Morris, Wayne; Miller, Rex D; Bob Thompson; Keane, Ken AFTRCC Counsel
Subject: RE: AFTRCC-AT&T Frequency Coordination

Mr. Sutliff

With reference to the messages below, AFTRCC accepts your proposal for coordination of the use requested below, and requests that notification prior to testing be sent, preferably by email, to:

Darryl J. Holtmeyer
AFTRCC Chair - Telemetry Coordinator

P.O. Box 516 Mail Code S306-2005
St. Louis, MO 63166
darryl.j.holtmeyer@boeing.com
www.aftrcc.org
314-233-1117

AFTRCC will retain on file the information provided.

On a separate, but related matter, we have noted that your existing Experimental License WD2XDQ (copy attached) reflects use of the band 2385-2390 MHz. We have no record of coordination for AT&T's use of this band, which is exclusive flight test spectrum, nor any record of AT&T ever having asked to coordinate its usage. A renewal application is pending for this license. Under the circumstances, we intend to file as soon as possible an objection to a grant of this renewal application.

Darryl J. Holtmeyer
AFTRCC Chair - Telemetry Coordinator
St. Louis, MO
darryl.j.holtmeyer@boeing.com
www.aftrcc.org

314-233-1117
636-239-7565 Home Office
FAX 425-965-8233
Normal Work Schedule; Mon.-Thurs. 6:30 am -5:00 pm

From: SUTLIFF, LARRIE, ATTLABS [mailto:ls4674@att.com]
Sent: Monday, August 06, 2007 10:53 PM
To: Holtmeyer, Darryl J
Cc: dhankins@cessna.textron.com; BARNICKEL, DONALD J (DON), ATTLABS; Hart, W. Clark; sutliff@att.net
Subject: RE: AFTRCC-AT&T Frequency Coordination

Mr. Holtmeyer,

Thanks for your prompt reply. I have notified the FCC that AT&T and AFTRCC are in the process of negotiating frequency coordination in the bands 2310-2320 and 2345-2360 MHz so the time pressure to complete coordination (by today's deadline) should be relieved, at least temporarily.

Since this appears to be the first time AT&T and AFTRCC have coordinated frequency use, and due to the experimental nature of our special temporary authority request, some additional background information may be useful. The original STA application, copy attached, was filed by AT&T last summer in an effort to permit propagation testing, which was underway in portions of the aforementioned bands in Western New Jersey, to expand into adjacent Eastern Pennsylvania during the late summer and fall, beginning while foliage was present, and continue on through the winter. However, consideration of the application by the FCC apparently did not occur until recently. In the meantime, the specific experiment that was underway last year at the time of application has been completed, albeit without the Eastern Pennsylvania data. Given the long interval associated with these applications, AT&T plans to continue with this STA submission in anticipation of additional experimental testing activity during the pendency of the authorization, when granted. However, no specific additional experiments have been designed to date. Therefore, AFTRCC's review, at this time, of the technical parameters associated with future experiments becomes problematic. Review of AFTRCC's Form 87-1 supports this concern, since it requires a number of technical details which would be necessary for interference computation studies.

For this reason, I suggested in my initial note, below, a proposed agreement that would require AT&T, when a specific use is contemplated, to notify AFTRCC of the technical details of proposed experimental activity in the subject bands and await a response before commencing transmissions. FYI, a listing of the type of technical details required to be used by point-to-point coordinators of non-government microwave spectrum and a description of the frequency coordination process may be found in the FCC Rules at 47CFR101.103(d), available online at: http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=3ab8cb5f2c812a9c7e7b9f325352a0de&rgn=div8&view=text&node=47:5.0.1.1.7.3.167.2&idno=47. Many of the technical details listed in Section 101.103(d)(2) parallel those delineated in AFTRCC's Form 87-1 The coordination process described in Section 101.103(d)(2)(i) may provide a useful model for AT&T/AFTRCC interaction as well.

With regard to the collection of fees for frequency coordination services, it is accepted industry practice for frequency coordination agents (who provide a service similar to AFTRCC) to charge their clients for locating frequencies for potential client deployments and for protecting their client's operations from potential interference from transmissions proposed by others. Upon notification of the technical parameters of a proposed operation by the proponent via a prior coordination notice (PCN), the agent, who typically has a database of all incumbent stations, will conduct a technical analysis to determine if there is a potential for interference to its clients or if the proposed use can be cleared. A response is forwarded to the proponent either clearing the proposed frequency use or identifying specific problems (if there are concerns, a resolution is usually negotiated). The proponent, who is proposing specific frequency activity for its own use, is not charged for the agent's efforts to protect its clients. AT&T

believes a similar fee structure is appropriate in this case.

It may be that a brief description of last year's propagation experiment would be useful to you since future experiments could have similarities. An AT&T tower in Hamilton Square, NJ (near Trenton), was equipped with a system of radio receivers. A van, equipped with a transmitter and a directional antenna mounted on a pneumatic mast, originated signals on a single frequency from a number of specific, previously selected geographic locations. No mobile operation (transmission while the vehicle was in motion) was conducted. Data related to the received signal and the transmitted signal, including location of the van at the time of transmission, was GPS time stamped, recorded and later analyzed.

Thank you for your consideration of the information provided above- I look forward to our continued dialog.

Larrie Sutliff
AT&T Labs

From: Holtmeyer, Darryl J [mailto:darryl.j.holtmeyer@boeing.com]
Sent: Thursday, August 02, 2007 7:17 AM
To: Larrie Sutliff
Cc: dhankins@cessna.textron.com; BARNICKEL, DONALD J (DON), ATTLABS; sutliff@att.com; Hart, W. Clark
Subject: RE: AFTRCC-AT&T Frequency Coordination

Mr. Sutliff,

I discussed your coordination request with Danny Hankins, and AFTRCC counsel. AFTRCC intends to coordinate your request, but will need time to get coordination from the DoD Area Frequency Coordinator, which will be in work today. Hopefully this process will not take more than a couple of days. AFTRCC will show in its coordination records that the use will be statewide in Pennsylvania.

AFTRCC requests that you complete and submit to our post office box a completed 87-1 form which is available on our website at www.aftrcc.org. The fee for the STA coordination will be $ 225 and payment should be included with the 87-1 form.

AFTRCC will include the following statement on the form:

AFTRCC requests the Commission limit any grant of the STA to operations outside the frequency band designated for flight test telemetry (2360 to 2395 MHz) and expressly conditioned on AT&T?s compliance with Part 27 Rules including, but not limited to, out of band emission limits.

Successful coordination data will be entered into AFTRCC records for use in coordination of any future primary and/or secondary use requests received.

Darryl J. Holtmeyer
AFTRCC Chair - Telemetry Coordinator
St. Louis, MO
darryl.j.holtmeyer@boeing.com
www.aftrcc.org
314-233-1117
636-239-7565 Home Office
FAX 425-965-8233
Normal Work Schedule; Mon.-Thurs. 6:30 am -5:00 pm

From: Larrie Sutliff [mailto:sutliff@att.net]
Sent: Wednesday, August 01, 2007 3:57 PM
To: Holtmeyer, Darryl J
Cc: dhankins@cessna.textron.com; Barnickel, Donald J (Don), ALABS; sutliff@att.com
Subject: AFTRCC-AT&T Frequency Coordination

Mr. Darryl Holtmeyer

AFTRCC Telemetry Frequency Coordinator
The Boeing Company
St. Louis, MO 63166
314-233-1117

Mr. Holtmeyer,

Mr. Danny Hankins, AFTRCC HF/VHF Coordinator, spoke with me today in your absence (on a call arranged by Mr. Bob Thompson) to provide background information regarding AFTRCC and to discuss my request for approval of a proposed frequency coordination process between AFTRCC and AT&T Laboratories. He has referred me to you, as the AFTRCC telemetry coordinator, regarding the frequency coordination request described below.

AT&T has applied to the FCC for an STA to conduct experimental operations in the frequency bands 2305-2320 MHz and 2345-2360 MHz in various locations in Eastern Pennsylvania (to supplement our experimental activity in Western New Jersey already authorized under experimental license WD2XDQ). The FCC has required, as a condition for approval of this authorization, that AT&T coordinate with AFTRCC for operation in the bands 2310-2320 MHz and 2345-2360 MHz. This request for coordination is somewhat out of the ordinary since, at this time, no transmit locations have been identified, however, AT&T Labs expects to design future propagation evaluation experiments which will involve use of these bands in Eastern Pennsylvania during the pendency of the requested STA. In order to facilitate FCC approval of AT&T's STA request, I propose that AT&T commit to the following coordination procedure with AFTRCC:

Prior to transmission in the bands 2310-2320 MHz and 2345-2360 MHz from stations located in Pennsylvania, AT&T Labs will contact AFTRCC and supply technical details of the proposed operations, including transmitter location, frequency, EIRP and antenna type, orientation and elevation. AT&T Labs will begin transmissions from these stations only after receiving clearance from AFTRCC or after 30 days from the date of notification if no response is received.

Your concurrence with this process via return email will allow AT&T to respond to the Commission's requirement for coordination with AFTRCC as part of the STA approval process. Your prompt response will be appreciated, since the FCC deadline for AT&T response is August 6th. If you would like to discuss, please call me on one of the numbers listed below. Thanks much for your consideration of this request.

Larrie Sutliff
AT&T Labs
W: 732-420-7017
C: 732-693-4504

References:

Mr. Danny Hankins
AFTRCC HF/VHF Frequency Coordinator
Cessna Aircraft Company
Wichita, KS

316-517-7053

Mr. Bob Thompson
AFTRCC
Cartersville, GA
770-494-2893