



September 18, 2014

**Via Electronic Filing**

Mr. Nnake Nweke  
Chief, Experimental Licensing Branch  
Office of Engineering and Technology  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

Re: Qualcomm Technologies, Inc., Experimental Application, File No. 0628-EX-PL-2014

Dear Mr. Nweke:

Alta Wireless, Inc. (Alta Wireless), a subsidiary of EchoStar Corporation, is a Local Multipoint Distribution Service (LMDS) licensee authorized to operate using Channel Block A (*i.e.* the 27.5-28.35 GHz, 29.1-29.25 GHz, and 31.075-31.225 GHz frequency bands) in the San Diego, California Basic Trading Area (“BTA”) market.<sup>1</sup> Alta Wireless’ LMDS system is operational and currently leased to a customer.<sup>2</sup>

On August 18, 2014, Qualcomm Technologies, Inc. (Qualcomm) filed the above-referenced experimental application seeking authority, for a two-year period, to use the 27.5-30.0 GHz frequency band, which includes essentially all of the LMDS frequencies licensed to Alta Wireless in the San Diego BTA market. The site that Qualcomm has identified for its experimental operations is within a half mile from an LMDS site that is utilized by Alta Wireless’ customer. Further, Alta Wireless is currently exploring expanding its LMDS network to other areas within its San Diego BTA license. The expansion may include sites that are located near the Qualcomm experimental test site. Given the technical parameters of the proposed operations, including specifically the proposed power levels, Alta Wireless is concerned about potential harmful interference to its licensed LMDS system from Qualcomm’s experimental operations.

Accordingly, Alta Wireless urges the FCC to adopt the following conditions to ensure that Alta Wireless and its customer are protected from harmful interference from Qualcomm’s experimental operations:

1. Qualcomm shall coordinate with Alta Wireless before commencing operations. 5 C.F.R. § 5.85(e). Such coordination shall include periodically

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<sup>1</sup> See Call Sign WPOH667, File No. 0006405316.

<sup>2</sup> See ULS File No. 0006441518.

providing Alta Wireless a schedule of all tests, which provides at least a 14-day notice for each test.

2. Qualcomm shall provide Alta Wireless a 24/7 "Stop Buzzer" contact.
3. If Alta Wireless suffers any harmful interference from Qualcomm operations under the experimental authorization, Qualcomm shall immediately cease operations until the interference issue can be resolved. 47 C.F.R. §§ 5.85(c), 5.111(a)(2).
4. Qualcomm shall file a monthly experimental report with the Commission and provide a courtesy copy to Alta Wireless, detailing the results of all testing conducted that month. 5 C.F.R. § 5.73(b).
5. The experimental authorization shall expire in 90 days.

Thank you for your consideration in this matter. Please let us know if you have any questions or require additional information.

Very Truly Yours,

*/s/Jennifer A. Manner*

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cc: Behnam Ghaffari, FCC (via email)