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Ms. Kathy Smith
Chief Counsel
Office of the Chief Counsel
National Telecommunications and
Information Administration
U.S. Department of Commerce
Room 4713
1401 Constitution Avenue, N.W.
Washington, DC 20230

Re: Rural Wireless Broadband Access in the 3650-3700 MHz
Band, Docket No. 040116021-4021-01D

Dear Ms. Smith:

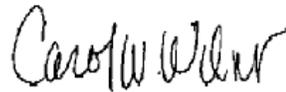
In response to the Federal Register notice published January 28, 2004, AT&T Corp. ("AT&T") submits these comments in the above-entitled Notice of Inquiry. AT&T supports efforts to develop alternative means of accessing customers – for both narrowband and broadband services – and supports the proposed opening of spectrum for use by unlicensed devices, provided that means are established to prevent harmful interference to AT&T's C-band satellite earth stations.

As noted in AT&T's comments to the Federal Communications Commission, filed April 17, 2003 in ET Docket No. 02-380, AT&T operates satellite earth stations, some of which are licensed to operate in the Extended-C band (*i.e.*, 3650-3700 MHz). Unless appropriate measures are employed, operation of unlicensed devices in the Extended-C band could directly interfere with these earth stations, which are very sensitive to interference. Nevertheless, because these earth stations generally are located in remote locations, AT&T believes that mitigation measures, such as geographic limitations, power limitations, frequency hopping, and/or use of "smart" devices, can be implemented to permit deployment of unlicensed devices in this spectrum, while still protecting these earth stations from harmful interference.

AT&T also operates other C-band earth stations that could be adversely affected by unlicensed devices in the Extended-C spectrum unless mitigation measures are implemented. Although these earth stations are not licensed to receive signals in the Extended-C spectrum band, they are authorized to receive signals in the adjacent C-band (3.7 to 4.2 GHz). Moreover, their antennae actually receive and amplify signals in both the Extended-C and C bands, although only the licensed C-band signals are processed. If interfering uses are permitted in the adjacent Extended-C band, the interference potentially could “overdrive” the earth stations’ low noise amplifiers into their nonlinear operating range and degrade C-band signals, thereby disrupting communications received at these earth stations – and those of other C-band earth station operators. AT&T nevertheless believes the interference caused by unlicensed devices could be effectively mitigated through geographic limitations, power limitations, frequency hopping, and/or use of “smart” devices.

In short, AT&T supports the proposed opening of spectrum for use by unlicensed devices, provided that means are established to prevent harmful interference to AT&T’s C-band satellite earth stations. AT&T looks forward to reviewing interference mitigation measures proposed by those seeking to use such spectrum.

Sincerely,

A handwritten signature in black ink, appearing to read "Carol Wilner". The signature is written in a cursive, flowing style.

Carol Wilner