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ELECTRONICALLY FILED

Marilyn R. Abbott
Secretary
U.S. International Trade Commission
500 E Street SW
Washington, DC 20436

Re: *Certain Baseband Processor Chips and Chipsets, Transmitter and Receiver (Radio) Chips, Power Control Chips, and Products Containing Same, Including Cellular Telephone Handsets, Inv. No. 337-TA-543: Request to Appear at Public Hearing*

Dear Secretary Abbott:

Pursuant to the Commission's Notice of Public Hearing in the above-captioned matter, which was issued on February 9, 2007 and published in the Federal Register on February 15, 2007 (72 Fed. Reg. 7456), we hereby submit the request of respondent QUALCOMM Incorporated to appear and make an oral presentation at the public hearing to be held on March 21, 2007. The witnesses will include company officials as well as public safety and economic experts, including Joseph Hanna. A brief synopsis of QUALCOMM's oral presentation is attached.

If there are any questions, please contact the undersigned.

Respectfully submitted,



Cecilia H. Gonzalez

Counsel for QUALCOMM Incorporated

ORAL PRESENTATION OF QUALCOMM INCORPORATED

Public Hearing on March 21, 2007

Certain Baseband Processor Chips And Chipsets, Transmitter And Receiver (Radio) Chips, Power Control Chips, And Products Containing Same, Including Cellular Telephone Handsets, Inv. No. 337-TA-543,

Broadcom's assertion that the statute requires the Commission to issue its requested exclusion order and a cease and desist order in this investigation because the Commission has found a violation is incorrect under the law and the facts of this case. The record reflects the absence of an evidentiary basis necessary to support an exclusion order or a cease and desist order under Commission and Federal Circuit precedent, which precludes the issuance of such remedies. Moreover, because these remedies would harm the public interest by adversely impacting QUALCOMM's ability to continue its pioneering research and development efforts, such remedies are inappropriate and should not be issued under the unique circumstances of this case.

With respect to Broadcom's request that the ITC bar imports of downstream cellular telephone handsets, the evidence bearing on the nine-factor analytical framework established in the ITC's *EPROMs* case, and approved by the Federal Circuit, weighs against a downstream remedy.

Moreover, the evidence concerning the adverse impact of a remedy against chips or downstream products on the statutory public interest factors weighs against the issuance of any remedy here. Broadcom's proposed remedies would cripple implementation of dedicated first responder networks jeopardizing public health and safety. Redundancy in telecommunications networks (including handsets necessary to access those networks) essential to protect national security would be adversely impacted by Broadcom's proposed remedy. The proposed remedies would set back the U.S. from its current position as the global leader in telecommunications technology. Competition among telecommunications network providers would be reduced resulting in increased costs and reduced services and choices in handsets for consumers.