



**Patrick Welsh**  
Assistant Vice President  
Federal Regulatory Affairs

April 4, 2019

**Ex Parte**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re:    Use of Spectrum Bands Above 24 GHz For  
      Mobile Radio Services, GN Docket No. 14-177**

Dear Ms. Dortch:

On April 2, 2019, Tamara Preiss and Patrick Welsh of Verizon met separately with Umair Javed, Commissioner Rosenworcel's Wireless Legal Advisor, and William Davenport, Commissioner Starks' Chief of Staff and Senior Legal Advisor for Wireless and International. On April 3, 2019, we met separately with Erin McGrath, Commissioner O'Rielly's Wireless Legal Advisor, Will Adams, Commissioner Carr's Legal Advisor, and Aaron Goldberger, Chairman Pai's Legal Advisor. Also on April 3, 2019, Tamara Preiss met with Don Stockdale, Joel Taubenblatt, Jonathan Campbell, Blaise Scinto, John Schauble, and Nancy Zaczek (by phone) of the Wireless Telecommunications Bureau, along with Nicholas Oros of the Office of Engineering and Technology. The purpose of these meetings was to discuss the process for spectrum sharing of the 37-38.6 GHz band as proposed in the draft *Fifth Report and Order* (the "*Draft Order*") in the above-captioned proceeding.

Verizon reiterated its support for innovative spectrum-sharing regimes that can help meet the growing wireless broadband needs of both federal and non-federal users. To that end, we noted the important role secondary-market transactions can play in facilitating federal access to commercially licensed spectrum. We also encouraged the Commission to adopt rules on sharing the 37.6-38.6 GHz band that provide both federal and non-federal users the certainty they need to invest in next-generation wireless broadband networks. We explained that the coordination process outlined in the *Draft Order* lacks the much-needed clarity for such investment. We urged the Commission to make clear that licensees are under no obligation to agree to a federal entity's request for spectrum access and—when a licensee grants access—that the federal entity must operate on a non-interference basis to existing and future commercial deployment within the licensed area.

Marlene H. Dortch

April 4, 2019

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This letter is being filed pursuant to Section 1.1206 of the Commission's Rules. Should you have any questions, please contact the undersigned.

Sincerely,

A handwritten signature in blue ink, appearing to be "P. H. Dortch", with a long horizontal flourish extending to the right.

cc: (via email)

Aaron Goldberger  
Will Adams  
William Davenport  
Erin McGrath  
Umair Javed

Donald Stockdale  
Joel Taubenblatt  
Jonathan Campbell  
Blaise Scinto  
John Schauble

Nancy Zaczek  
Nicholas Oros