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ERRATUM

June 22, 2016

Ex Parte

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

Re: Use of Spectrum Bands Above 24 GHz for Mobile Radio Services, GN Docket No. 14-177- [RE-FILING WITH CORRECTED MEETING DATE IN TEXT]

Dear Ms. Dortch:

On June 16, 2016, Charla Rath, Gregory Romano, and William Johnson of Verizon (“Verizon”) met with members of the Wireless Telecommunications Bureau to discuss the Commission’s proposals in this docket and their effect on the development and deployment of 5G technology. Attached is a list of the Commission participants in the meeting.

Verizon reiterated its view that rather than assign licenses on a county level, the Commission should issue licenses for 28 GHz and 39 GHz that match those bands’ existing license sizes. The county-sized licenses proposed in the NPRM would be particularly problematic if the Commission implements strict, inflexible performance measures for each license area. As Verizon explained in its comments, the Commission should instead allow licensees to demonstrate that they are providing “substantial service” to qualify for license renewals.

Flexibility in any performance requirements is important to allow nascent mmW technologies to continue to develop and evolve. The Commission’s rules should encourage that creative development, not discourage it. One way to do that is to use safe harbors that provide non-exhaustive examples of what constitutes substantial service. Safe harbors for substantial service based on population coverage should take into account not just where people live, but also where they transit or visit. And if the Commission imposes build-out requirements, it should not impose an additional “use-it-or-share-it” requirement that would have the effect of creating two separate penalties to address the same issue.

Verizon also recapped why it believes the Commission should not apply aggregation limits to mmW spectrum. Companies require flexibility to transfer, share and acquire mmW

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spectrum to meet the large bandwidths that will likely be necessary for 5G deployment. The Commission should ensure such flexibility exists so that the wireless industry can propel the United States to be the global leader for 5G deployment.

We also emphasized that, to avoid interference to 5G operations from secondary satellite operations in the 28 GHz band, any zones that the FCC creates for deployment of new satellite earth stations should exclude areas described in our ex parte filed on June 14.¹ These include densely populated regions or areas that support transient populations, such as college campuses, airports and athletic venues. And any grandfathering of existing satellite gateways should use the cut-off date of October 23, 2015, the date that the FCC adopted its Notice of Proposed Rulemaking.

Sincerely,

A handwritten signature in blue ink, appearing to read "Charla Rath". The signature is fluid and cursive, with a large initial "C" and "R".

¹ See Ex Parte Letter of Charla Rath to Marlene H. Dortch, Docket No. 14-177 (June 4, 2016).

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Attachment- FCC Attendees

Wireless Telecommunications Bureau

Jon Wilkins

Catherine Matraves

Paul Powell

Brian Regan

John Schauble

Blaise Scinto

Joel Taubenblatt