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July 6, 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**

Dear Ms. Dortch:

On July 5, 2016, Charla Rath and Gregory Romano of Verizon (“Verizon”) met with Erin McGrath in Commissioner O’Rielly’s office to discuss the Commission’s proposals in this docket and their effect on the development and deployment of 5G technology. Verizon expressed appreciation for the Commission’s efforts and plans to move ahead with a Report and Order and Further Notice of Proposed Rulemaking at the July meeting. Done correctly, new rules that unleash millimeter wave (“mmW”) spectrum for 5G purposes can propel the United States to be the global leader in 5G.

Verizon explained that companies need flexibility to transfer, share and acquire mmW spectrum to meet the large bandwidths that will likely be necessary for 5G deployment. And given that the *Spectrum Frontiers Further Notice* will propose making an additional 17.7 GHz of mmW spectrum available for flexible use, there will be an abundance of mmW spectrum available as 5G technologies and services develop.¹ There is no reason for the Commission to adopt mmW spectrum aggregation screens (or, worse still, caps).

We also emphasized that, to avoid interference to 5G operations from secondary satellite operations in the 28 GHz band, any zones that the Commission creates for deployment of new satellite earth stations should exclude areas described in our ex parte filed on June 14.² These include densely populated regions or areas that support transient populations, such as college campuses, airports and athletic venues.

¹ See FCC, Fact Sheet: Spectrum Frontiers Proposal to Identify, Open Up Vast Amounts of New High-Band Spectrum for Next Generation (5G) Wireless Broadband, at 2 (June 23, 2016) available at http://transition.fcc.gov/Daily_Releases/Daily_Business/2016/db0623/DOC-339990A1.pdf (“*Spectrum Frontiers Fact Sheet*”).

² See Ex Parte Letter of Charla Rath to Marlene H. Dortch, Docket No. 14-177 (June 14, 2016).

Marlene H. Dortch

July 6, 2016

Page 2

Another key way to encourage 5G deployment is to afford carriers flexibility in meeting any performance requirements that the Commission decides to adopt. Flexibility will help allow nascent mmW technologies to continue to develop and evolve. One way to do that is to use safe harbors that provide non-exhaustive examples of what constitutes substantial service. And 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.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chad R. Rosen". The signature is fluid and cursive, with a large loop at the beginning and a long tail.

cc: Erin McGrath