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William H. Johnson  
Senior Vice President  
AGC – Regulatory Affairs

November 26, 2019

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

**Re: Expanding Flexible Use of the 3.7 to 4.2 GHz Band, GN Docket No. 18-122**

Dear Ms. Dortch:

On November 22, 2019, Greg Romano and I, along with Adam Krinsky of Wilkinson Barker Knauer, LLP, met with representatives from the Office of Engineering and Technology, the Wireless Telecommunications Bureau, the Office of Economics and Analytics, and the Office of General Counsel (see Attachment for list of FCC attendees).

During the meeting, Verizon raised the public interest importance of moving swiftly on repurposing and clearing 280 megahertz in the C-band for new 5G services. We discussed the importance of this spectrum as the United States seeks to maintain international competitiveness and win the global race to 5G. For the United States to meet or beat determined international competitors like China, it is vital that the FCC move quickly to make C-band or other mid-band spectrum available for 5G use.

With respect to the FCC's announced plans to publicly auction the spectrum, Verizon urged that the auction be conducted (and the spectrum repurposed) in the same timeframe as would have occurred with a private auction: an auction as early as possible in 2020 and clearing within the 18-36 month clearing timeframes expressed in the record. To meet that timeline, Verizon proposed that the FCC conduct a straightforward, conventional auction applying procedures generally consistent with those used for Auction 102 (24 GHz band) given that potential bidders are familiar with that format and the FCC could administer it easily.

We also discussed the process for clearing incumbent operations from the lower 300 megahertz of the C-band (280 megahertz for 5G and 20 megahertz for guard-band). In doing so, we emphasized that the Commission should identify appropriate incentives for clearing and penalties for failing to meet its benchmarks and deadlines.

Sincerely,

A handwritten signature in black ink, appearing to read "William H. Johnson". The signature is written in a cursive style with a prominent initial "W".

William H. Johnson

cc: Attachment

**Attachment**  
**November 22, 2019 Verizon Ex Parte Meeting: FCC Attendees**

**Office of Engineering and Technology**

Julius Knapp, Chief

**Wireless Telecommunications Bureau**

Anna Gentry\*

Matthew Pearl

Paul Powell\*

Becky Schwartz

Blaise Scinto

**Office of Economics and Analytics**

Jonathan Campbell\*

Patrick DeGraba\*

Erik Salovaara

Martha Stancill

Margaret Wiener

**Office General Counsel**

Bill Richardson

\* By telephone