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September 24, 2014

Ex Parte

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

Re: Amendment of the Commission's Rules with Regard to Commercial Operations in the 3550-3650 MHz Band, GN Docket No. 12-354

Dear Ms. Dortch:

Tamara Preiss, Chris Oatway, Max Solondz, Arda Aksu (via phone), Sanyogita Shamsunder (via phone), and I of Verizon met on September 22 with John Leibovitz, Paul Powell, and Kamran Etemad (via phone) of the Wireless Telecommunications Bureau and with Julius Knapp, Navid Golshahi, and Robert Pavlak of the Office of Engineering and Technology.

Verizon reiterated its position that the Commission should include the 3650-3700 MHz spectrum in the sharing framework established in the above-captioned proceeding.¹ We explained that the sharing framework should allow for a variety of use cases,² including ones (such as those already present in the 3650-3700 MHz band) that require higher power limits than those contemplated in the Further Notice of Proposed Rulemaking.³ We discussed the importance of establishing a Spectrum Access System (SAS) under which licensed users would be able to maintain control over their networks, and we discussed the importance of adequately addressing unauthorized channel use and other security issues.⁴ Finally, we explained that Verizon's proposed

¹ See, e.g., Reply Comments of Verizon and Verizon Wireless, GN Docket No. 12-354 (filed Apr. 5, 2013), at 3.

² See, e.g., Verizon Comments on Further Notice of Proposed Rulemaking, GN Docket No. 23-354 (July 14, 2014), at 7-10 ("Verizon FNPRM Comments").

³ Amendment of the Commission's Rules with Regard to Commercial Operations in the 3550-3650 MHz Band, Licensed Shared Access, *Further Notice of Proposed Rulemaking*, 29 FCC Rcd. 4273 (Apr. 23, 2014) ("FNPRM").

⁴ Verizon FNPRM Comments at 9-10, 17-18.

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transitional band plan would not hinder the Commission's vision of a three-tiered ecosystem because a portion of the band would be immediately available for such deployments, the two-tiered portion of the band would be subject to a sunset provision, and devices would be manufactured to tune across the entire 150 MHz of spectrum.⁵

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 "John Leibovitz", written in a cursive style.

cc: (via email)

John Leibovitz
Paul Powell
Kamran Etemad
Julius Knapp
Navid Golshahi
Robert Pavlak

⁵ *Id.* at 13-15.