

Patrick Welsh  
Assistant Vice President  
Federal Regulatory Affairs



April 6, 2015

**Ex Parte**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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:

On April 2, 2015, Chris Oatway and Patrick Welsh of Verizon met with Erin McGrath, Commissioner O'Rielly's wireless legal advisor.

During the meeting, Verizon reiterated its support for a three-tiered access regime for the 3550-3700 MHz band (the "3.5 GHz band"). We also discussed Verizon's interest in becoming a Spectrum Access System ("SAS") provider and using this spectrum as both a Priority Access License ("PAL") licensee and as a General Authorized Access ("GAA") user.

Our discussion focused on three issues. *First*, we endorsed the Commission's long-standing policy of adopting technology-agnostic rules with minimal technical and operational requirements. We encouraged the FCC to maintain this policy for the 3.5 GHz band and reject calls to proscribe air interfaces or use cases. We also reiterated our full support for a band plan based on Time Division Duplexing ("TDD"). While Verizon plans to deploy equipment and devices capable of bidirectional operation in the 3.5 GHz band, the Commission should avoid any statutory mandate that would limit how the spectrum is used. Instead, the Commission should make clear that both bidirectional and unidirectional services are allowed to operate in the band.

*Second*, Verizon urged the Commission to define the basic functional requirements of a SAS as a registry of authorized users and open channels that synchronize and share this information with other SAS providers. Setting minimal requirements and allowing SAS operators to differentiate services and offerings will enable SAS functionality to evolve over time and accommodate a variety of needs and business models.

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*Third*, Verizon expressed support for a “use-it-or-share-it” approach for accessing spectrum in the 3.5 GHz band. Because of the propagation characteristics of this spectrum and the limitations for commercial use to low-power, small cells on a secondary or tertiary basis, the Commission should make unused PAL spectrum available for GAA use. Specifically, if a PAL licensee has not both deployed services and registered its use with a SAS, that spectrum should be made available for GAA use. Once a PAL licensee deploys services on this spectrum, however, all GAA operations must cease in that geographic area when the PAL licensee registers those services with a SAS.

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 "Erin McGrath", written in a cursive style.

cc: (via email)  
Erin McGrath