



April 10, 2015

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## 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 8, 2015, Kathleen Grillo and Tamara Preiss of Verizon met with Louis Peraertz, legal advisor to Commissioner Clyburn, to discuss the above-referenced proceeding. 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 four 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 dictate air interfaces or use cases. 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. We also explained that the Commission should permit a SAS to change a PAL user's frequency allotment only as needed to accommodate incumbent operations.

*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

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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.

*Fourth*, we discussed the mechanics of the PALs auctions. If there is not sufficient demand in a geographic area to trigger mutual exclusivity for all seven PALs, the FCC should nonetheless adopt a mechanism to make PALs available to those firms that seek them.

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 black ink, appearing to read "Jonathan S. Klein". The signature is written in a cursive, flowing style.

cc: (via email)

Louis Peraertz