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Suite 400 West
Washington, DC 20005

May 23, 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 May 19, 2016, Charla Rath and Gregory Romano of Verizon (“Verizon”) met with members of the Wireless Telecommunications Bureau and the Office of Engineering and Technology to discuss 5G deployment and the proposed rules in Docket No. 14-177. The Commission participants in the meeting are listed in an attachment to this letter.

Verizon reiterated its view that rather than assign licenses on a county level, the Commission should issue licenses for 28 GHz and 39 GHz that match those bands’ existing license sizes. The county-sized licenses proposed in the NPRM would increase administrative costs both for the Commission and for operators. Verizon also believes that a single, contiguous 37-39 GHz band plan would create wideband licenses that would be more attractive and useful than the “hybrid” approach proposed for 37 GHz in the NPRM.

Verizon echoed points made in its comments regarding the need for flexibility for companies to transfer, share and acquire mmW spectrum to meet the large bandwidths that will likely be necessary for 5G deployment. And the Commission was correct in the NPRM to be skeptical about including mmW spectrum in the spectrum screen it applies when reviewing secondary market transactions.¹

We explained the current status of the discussions with the satellite industry regarding potential interference issues in the 28 GHz band. We reiterated points we have made in our comments that, for purposes of providing earth station operators assurances on potential interference with mobile uses, the Commission should draw a clear distinction between existing

¹ *Use of Spectrum Bands Above 24 GHz for Mobile Radio Services*, Notice of Proposed Rulemaking, 30 FCC Rcd 11878, ¶ 192 (2015).

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and future satellite operations. It also remains important to recognize that satellite use of the 28 GHz band is a secondary allocation to terrestrial services, and that the Commission should be careful to ensure that new satellite earth stations are not allowed to cause interference to 5G devices in areas where they are likely to be used.

Sincerely,

/s/ Gregory M. Romano

Gregory M. Romano
Vice President & Associate General Counsel

cc: Attached List

Attachment- FCC Attendees

Wireless Telecommunications Bureau

Brian Regan
Chris Helzer
Simon Banyai
Blaise Scinto
Charles Oliver
John Schauble
Stephen Buenzow
Tim Hilfiger
Nancy Zaczek
Catherine Schroeder

Office of Engineering and Technology

Michael Ha