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December 19, 2006

**Ex Parte**

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

Re: WT Docket No. 05-211, Competitive Bidding Rules and Procedures  
WT Docket No. 06-150, 700 MHz Service Rules  
WT Docket No. 06-169, 700 MHz Guard Band Rules

Dear Ms. Dortch:

On December 18, 2006, Don Brittingham, Michael Samssock and Charla Rath, representing Verizon Wireless, met with Fred Campbell, Legal Advisor to Chairman Kevin J. Martin, to discuss the company's positions, as expressed in previously filed comments and reply comments, in the above-captioned proceedings. Verizon Wireless believes that, with minor exceptions, the FCC should not change its 700 MHz service rules. In our comments, we urged the FCC to make a single change, that is, to extend the license term for 700 MHz licensees. In addition, during the meeting, we expressed our support for the industry's "power spectral density" rule for PCS and believe that such a rule should be applied to the 700 MHz band. Any additional changes to the FCC's current band plan and service rules are neither necessary nor appropriate and could undermine the ability of the Commission to meet its obligation to auction the spectrum in accordance with timelines established by law.

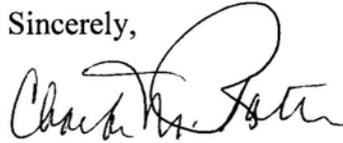
In addition, we noted our concerns about making changes to the Guard Band rules that would increase the potential for interference to public safety and/or reduce the effective use of commercial spectrum in the band. In particular, it was noted that elimination of the Guard Bands, which are designed to protect public safety systems from potentially harmful commercial operations, would be premature absent assurances that the public safety spectrum will be used in a manner that is compatible with commercial systems.

December 19, 2006

Page 2

Pursuant to section 1.1206(b)(2) of the Commission's rules, an electronic copy of the letter is being filed for inclusion in the above-referenced docket. Please direct any questions regarding this filing to the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Charla M. Rath". The signature is fluid and cursive, with a large loop at the end.

Charla M. Rath

cc: Fred Campbell