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February 16, 2007

**Ex Parte**

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

Re: WT Docket No. 06-150, 700 MHz Service Rules  
WT Docket No. 06-169, 700 MHz Guard Band Rules

Dear Ms. Dortch:

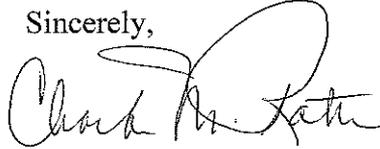
On February 15, 2007, Michael Samscock and Charla Rath of Verizon Wireless and Peter Cramton of Criterion Auctions, LLC, met with Evan Kwerel and John Williams of the Office of Strategic Planning and Policy Analysis to discuss Verizon Wireless' positions in the above captioned proceedings, as expressed in our previous filings.

In particular, we discussed Verizon Wireless' view that by keeping the existing band plan of regional licenses, the Commission will avoid an inefficient auction result and years of carriers attempting to obtain the necessary bandwidth and coverage through post-auction, secondary market transactions. The existing band plan would encourage rapid deployment of service, promote interoperability and the setting of standards, and allow economies of scale that will encourage the development of low cost equipment in the 700 MHz band. Such efficiencies and economies of scale in the CMRS market have driven existing wireless carriers to assemble either regional or national service areas, to the benefit of the consumer. The latest auction provided even more evidence of those efficiencies.

In addition, Ms. Rath noted Verizon Wireless' 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.

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, prominent loop at the end of the last name.

Charla M. Rath

cc: Evan Kwerel  
John Williams