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March 7, 2007

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

Re: Notification of *Ex Parte* Communication
WT Docket Nos. 96-86, 06-150; PS Docket No. 06-229

Dear Ms. Dortch:

This letter is to report certain permitted, oral *ex parte* meetings of Frontline Wireless, LLC (“Frontline”) and its counsel concerning the above-referenced proceedings.

Specifically, yesterday, Janice Obuchowski and Stagg Newman (Chairman and CTO, respectively, of Frontline) and Jonathan D. Blake and Gerard J. Waldron (counsel to Frontline) met with Commissioner Robert M. McDowell and his Legal Advisor, Angela E. Giancarlo. Today, Messrs. Newman and Waldron and the undersigned met with Julius Knapp and Bruce Romano of the Office of Engineering and Technology, and briefly spoke with Jeffery Goldthorp. The attached materials were presented in the meeting with Messrs. Knapp and Romano.

In the meetings, the parties discussed Frontline’s Public Safety Deployment Plan, which would meet the Commission’s critical goals for extending broadband to all Americans, including those in rural areas, and for providing a privately funded, national public safety network for interoperability. The parties also discussed proposed service rules that would allow the FCC to implement this Plan by relying on existing Commission authority and without delaying the 700 MHz spectrum auction.

Please direct any questions concerning this matter to the undersigned.

Sincerely,



Matthew S. DelNero
Counsel to Frontline
Wireless, LLC

**Frontline Wireless
Upper 700 MHz
Public Private Partnership**

March 2007

Proposal

- Frontline is formed to build nationwide broadband network in upper 700 MHz band
 - Public/private partnership serving public safety's interoperable communications needs
 - 4G, open IP stack
 - Finalize service rules
 - Maintain auction schedule

Frontline Rules Proposal

Service Rule Proposals

1. Designate 10 MHz block of commercial spectrum next to public safety
 - Network sharing with public safety for emergencies
 - Build out requirements ensure service to nearly every American
 - Commercial licensee obtains secondary access to excess public safety capacity
2. Require “open IP” for this spectrum
 - Any device, with “no harm” rules (like Part 68)
 - Any service provider, QoS permitted
 - Roaming solution for rural and other carriers seeking to fill in holes

Key Benefits

- “Free Buildout for PS”
- More spectrum in emergencies
- Innovation from open device and application interconnect
- Unit Level Local command and control
- National Interoperability and roaming

Frontline E Band Proposal

Yellow = Public Safety: 12 MHz pair

Red = A Block: 1 MHz pair

Blue = B Block: 2 MHz pair

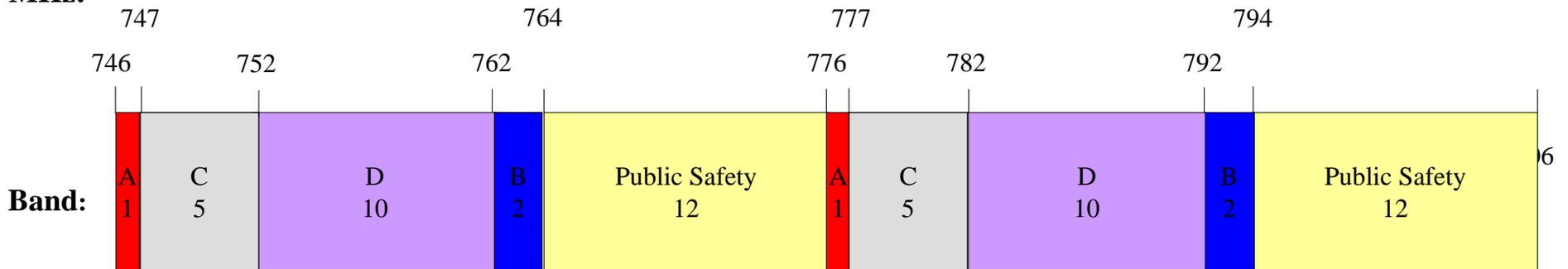
Gray = C Block: 5 MHz pair

Purple = D Block: 10 MHz pair changes to 5 MHz pair

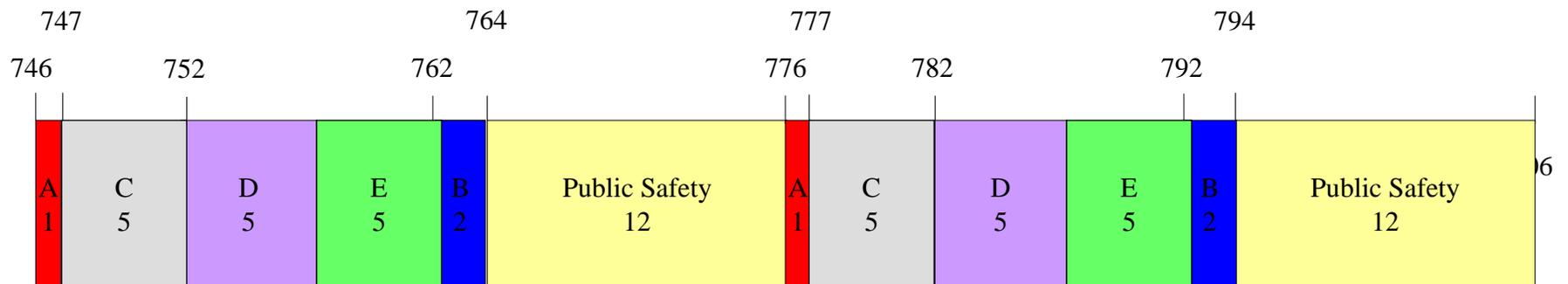
Green = New E Block Pair: 5 MHz

Current Upper 700 MHz Bandplan

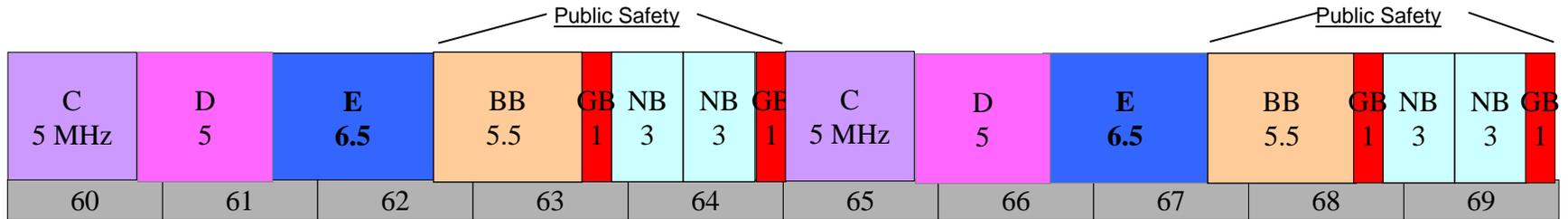
MHz:



New E Block 700 MHz Bandplan



Upper 700 MHz Band Plan IF the FCC Adopts the BOP



- E Block

- Nationwide license with obligations to build Public Safety and Commercial BB Network
- Shared infrastructure
- Coverage to 75% of CONUS with QOS and reliability for Public Safety
- PS owns PS BB spectrum with commercial as secondary totally preemptible user
- Individual PS agencies have their own (logical) networks as well as nationwide network for interoperability
- Public Safety has priority wireless BB service on E block in case of major emergency

What Kind of Network?

- Dual purpose shared infrastructure
 - Primary network for public safety users in public safety spectrum
 - Wholesale network in commercial spectrum to complement operators of other 3G/4G networks
- Leverages superior 700 MHz propagation
 - Perfect for rural and deep rural coverage
 - 10X cell area of 2.5 GHz spectrum
 - Enhance in-building penetration and mobility in city core
- Lowest cost coverage build
 - Large cell sizes, particularly in rural morphologies
 - Perfect capillary structure for wire-based backhaul network
- Open IP: Supports video, rich media, other services
 - All IP 4G network
 - High bandwidth, QoS