

March 16, 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, on Thursday March 15, 2007, Janice Obuchowski (Chairman of Frontline), Stagg Newman (CTO of Frontline), Gerard J. Waldron and the undersigned met with Jeffrey Cohen, Senior Legal Counsel of the Public Safety and Homeland Security Bureau, and Dana Shaffer, Chief of the Bureau’s Policy Division. In a separate meeting on the same day, Mr. Newman, Jonathan D. Blake, Mr. Waldron and the undersigned met with Cathleen Massey and Jim Schlichting, Deputy Chiefs of the Wireless Telecommunications Bureau. The attached materials, as well as Frontline’s recent filings in the above-referenced proceedings, were presented in both meetings.

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

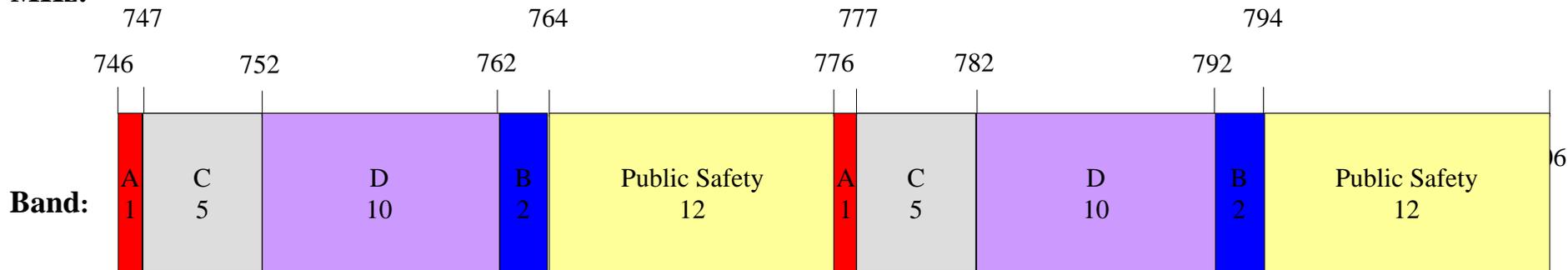
Gray = C Block: 5 MHz pair

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

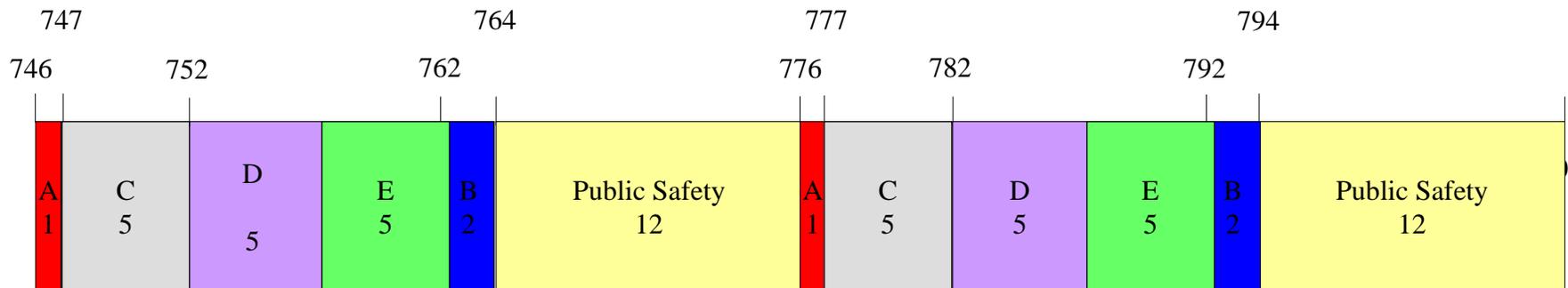
Green = New E Block Pair: 5 MHz

Current Upper 700 MHz Bandplan

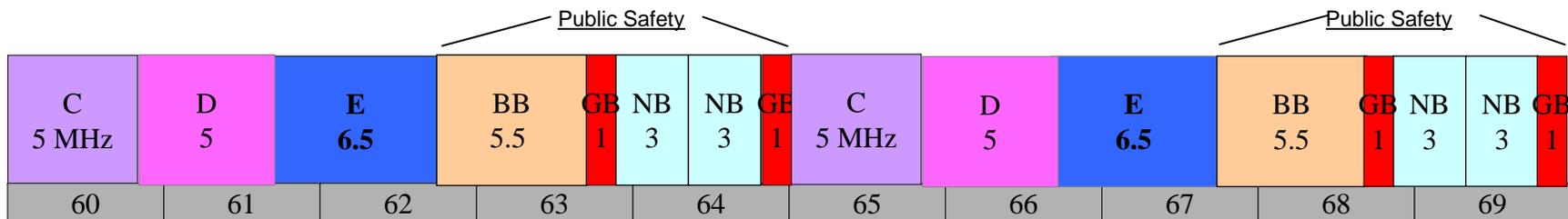
MHz:



New E Block 700 MHz Bandplan



Upper 700 MHz Band Plan IF the FCC Adopts the BOP



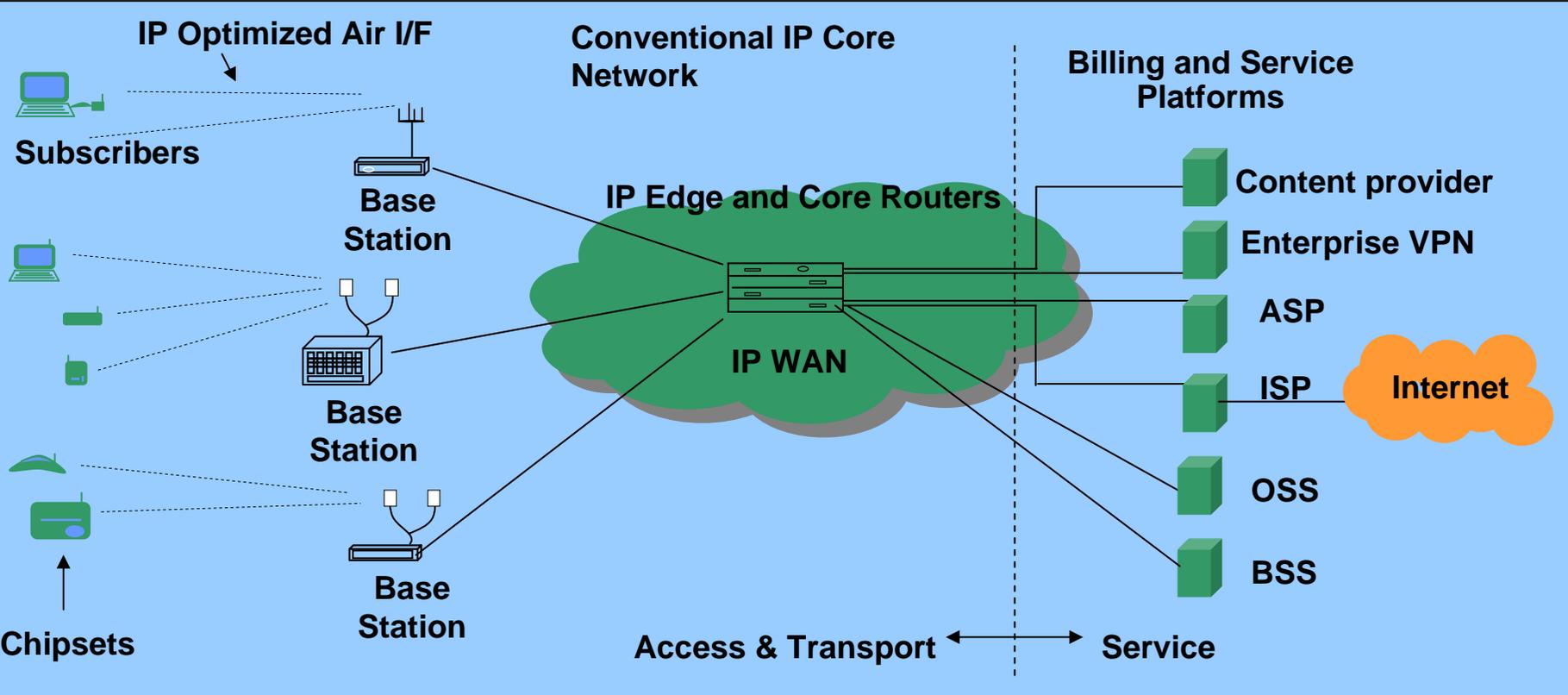
- E Block

- 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

AND THE EMERGING WIRELESS BB TECHNOLOGIES OFFER THE BENEFITS OF AN “IP FRIENDLY” ARCHITECTURE



Advantages

- Simple extension of IP networks - seamless internetworking
- Increased spectral efficiency
- Effective capex deployment
 - CPE and installation
 - Base stations and sites
 - Backhaul and core network

Key questions

- How does each of the new technologies meet these goals?
- What are each technologies distinctive pluses? Minuses?



For Immediate Release

FRONTLINE LAUNCHES PLAN FOR MORE FIRST RESPONDER SPECTRUM

WASHINGTON, D.C., and GREENSBORO, N.C., February 26, 2007 – Frontline Wireless, LLC today announced that it is filing at the FCC a breakthrough proposal meeting Chairman Kevin Martin’s call for a market-based approach to providing a national public safety network. To reach these goals, Frontline intends to create an open access, wholesale broadband 4G network serving both public safety users and carriers. Frontline has begun assembling a bidding group for acquiring the necessary spectrum in the upcoming commercial auction of the 700 MHz band.

Frontline’s FCC plan provides: (1) Significantly more spectrum for first responders and the ability to use commercial airwaves on a priority basis when needed; (2) Free buildout of a hardened, robust 4G network; (3) Maximum equipment choice with the use of open network standards; (4) Local control for local agency networks; and, (5) Nationwide interoperability among all networks. The plan would not require statutory changes or cause delays to the 700 MHz auction.

To begin delivering these benefits to first responders as soon as possible, Frontline will submit a proposal to the FCC today to unleash additional, critically needed spectrum for public safety’s broadband use in the 700 MHz band. The proposal provides the best path forward – for both public policy and commercial interests – to advance FCC efforts to maximize public safety access to broadband spectrum. Frontline lauds, and plans to fulfill, the Commission’s intent to develop a national approach to promoting new funding sources for network buildout and new technology applications for first responders in this spectrum.

Led by industry veterans and public policy leaders, Frontline’s team includes Chief Executive Officer Haynes Griffin, Chairman Janice Obuchowski and Vice Chairman Reed Hundt. Mr. Griffin is a wireless entrepreneur who founded Vanguard Cellular, later sold to AT&T Wireless, and is a past chairman of the Cellular Telecommunications Industry Association. Ambassador Obuchowski has served the government in several leadership posts, including as administrator of the National Telecommunications and Information Administration and U.S. Ambassador to the 2003 World Radiocommunication Conference. Mr. Hundt is a past chairman of the FCC.

Relying on market-based solutions and consistent with the FCC’s current plan to auction 60 MHz of spectrum in the 700 MHz band, Frontline’s proposal would meet public safety users’ mission-critical requirements. The plan calls for a free infrastructure buildout for

first responders and would provide a national, robust 4G network for interoperability, under the control of public safety users.

Frontline’s plan would ensure that the upcoming 700 MHz auction occurs on the schedule established by the DTV Transition Act. The plan would enable the FCC to simultaneously advance public safety goals and speed broadband wireless access for all Americans – especially those living in rural areas – all goals to which the FCC has demonstrated a steadfast commitment.

Under the plan, the FCC would license a portion of the 700 MHz commercial spectrum under the condition that the commercial licensee build a nationwide public safety broadband network and give public safety agencies priority access to the commercial spectrum during emergencies. The spectrum also would be licensed under provisions that would promote the development of advanced technologies and let both public safety users and consumers connect any device to the network as long as “do no harm” safeguards are met.

Ram Shriram, Managing Partner of Sherpalo Ventures and an early investor in Frontline, said, “Frontline’s plan would facilitate the buildout of an advanced, 4G wireless broadband network for public safety and provide new freedom for wireless consumers by removing restrictions on the devices and applications that can be used on the network.”

Ambassador Obuchowski noted: “Through a true public safety-commercial partnership, Frontline’s plan provides a solution to the still-unresolved hurdles to interoperable communications faced by first responders, including the continued need for more spectrum.

“We look forward to working with the FCC, which has provided strong leadership in these important issues, the public safety community and all other stakeholders to improve wireless broadband network availability for consumers and public safety users, including in rural markets,” she said.

“This plan relies on a wholesale operating model that brings the commercial business focus for this spectrum in line with public safety needs for a robust 4G network,” said Mr. Griffin. “Our proposal also allows the benefits of this successful business model to be shared with smaller and rural wireless operators, with a commitment to bring them nationwide roaming as part of ensuring wide coverage deployment for public safety.”

Frontline plans to file the “Public Safety Broadband Deployment Plan” at the FCC later today as part of a proceeding that is examining how to implement a nationwide, broadband interoperable public safety network. The plan would designate a block of commercial spectrum neighboring the public safety allocation. This commercial licensee would be required to:

- Build a nationwide broadband network that meets public safety requirements for interoperability, security and robust platforms for broadband.

- Provide public safety with priority access to this commercial broadband spectrum during emergencies.
- Operate the network according to “open access” principles, allowing end users freedom to connect devices and use Internet services as they please.
- Provide commercial operations as a wholesale network “utility”, with the exclusive right to use the excess capacity of the public safety broadband spectrum on a secondary basis, subject to unconditional preemption by public safety users.

“I’m very enthusiastic about the open access dimension of Frontline's business plan,” Mr. Hundt said.

"Frontline's proposal would provide earlier deployment and more spectrum for broadband wireless for public safety users, free infrastructure buildout, local network control, freedom of choice in equipment decisions and guaranteed interoperability with strong security and controls when first responders need to talk to each other during an emergency,” said Frontline Chief Technology Officer Stagg Newman, who is a former Chief Technologist for the FCC. “Frontline's plan also would provide new freedom for wireless consumers by removing restrictions on the devices and applications that can connect to the network.”

For more information, reporters may contact Mary Greczyn on behalf of Frontline Wireless at (202) 371-2997 or mg@ftidc.com.

About Frontline Wireless

Frontline Wireless, LLC, is based in Greensboro, N.C., with offices in Washington, D.C. Frontline is organized for the purpose of building a nationwide public safety broadband network and is committed to providing innovative solutions for public safety and commercial users alike. For more information on Frontline’s plan, please visit: www.frontlinewireless.com.

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