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June 14, 2007

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 - 12<sup>th</sup> Street, SW, Room TW-A325  
Washington, DC 20554

**Re: *Ex Parte* Presentation  
WT Docket No. 06-150 – “700 MHz Service Rules”**

Dear Ms. Dortch:

On June 13, 2007, Charla Rath, Executive Director – Spectrum Policy for Verizon Wireless, and the undersigned met with Aaron Goldberger in Commissioner Tate’s office to discuss the 700 MHz Further NPRM. We also discussed the 700 MHz power rules adopted in the recent Report and Order and our belief that some of those rules should be reconsidered. A summary of the issues discussed at the meeting is attached.

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

Respectfully submitted,

VERIZON WIRELESS

By: /s/ Donald C. Brittingham

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Donald C. Brittingham  
Director – Wireless / Spectrum Policy

Attachments

cc: Aaron Goldberger

**FCC Docket WT No. 06-150  
“700 MHz Further NPRM”**

**Verizon Wireless Ex Parte Meeting**

**The Commission should adopt a band plan that facilitates wireless broadband development and participation by a variety of companies.**

- VZW supports FCC-recommended plan for Lower Band (FNPRM, Figure 3)
- VZW supports “Proposal 3” for Upper Band (FNPRM, Figure 8)

**The Commission should reject proposals to radically restructure licensee performance requirements.**

- If Commission believes specific rules are needed, population-based requirements will ensure rapid, efficient build-out of commercial and public safety networks.
  - 50% POP coverage within 5 years
  - If not met, license term reduced to 8 years
  - 75% POP coverage by end of license term (8 or 10 years)
  - If not met, licensee loses uncovered area (“Keep what you use”)

**The Commission should adopt procedures that promote a competitive auction.**

- Requests to prohibit incumbents from bidding should be rejected.
- Package bidding should not be used for the auction.
- Anonymous bidding should be used with no eligibility ratio threshold.

**The Commission should adopt rules that promote public-private partnerships.**

- Frontline “poison pills” should be rejected.
  - “Open access,” wholesale-only, and automatic roaming requirements are designed to restrict participation and advantage Frontline.
  - “Open access” requirement would undermine public safety objectives.
- Public safety must have control over how its spectrum is used and how any public safety network is built.

- Frontline proposal creates enormous uncertainty and risk for commercial licensees and public safety.
- If a “conditioned license” approach is adopted, the Commission must work with Public Safety to identify requirements in advance of the auction.