Verizon Wireless Petition for Reconsideration of 700 MHz Power Rules

(Report & Order; WT Docket No. 06-150)

- Verizon Wireless supports the Commission's efforts to provide regulatory symmetry for all 700 MHz licensees, while promoting broadband deployment.
    - Power spectral density rule that limits power on a "per MHz" basis.
    - Higher power limits in rural areas.
- Unfortunately, the *Report and Order* would result in these more flexible rules being applied disparately across the 700 MHz band, across different technologies, and across various geographic markets. For example:
    - Upper 700 MHz Band licensees choosing to deploy broadband would be held to a more rigorous standard than those deploying narrowband.
    - Licensees operating in rural areas would be more limited in their deployment of broadband technologies.
- While perhaps unintentional, these regulatory disparities would frustrate the Commission's goals of technology neutrality and uniformity in CMRS regulation, and could undermine the deployment of broadband technologies.
- Verizon Wireless recommends a few minor (though important) modifications to the Commission's recently adopted rules.
    - Modify the power flux density rule for the Lower and Upper 700 MHz bands such that the limit applies for any base or fixed station exceeding 1000 watts ERP and 1000 watts per MHz ERP;
    - Make clear that all Lower and Upper 700 MHz licensees exceeding 1000 watts ERP and 1000 watts per MHz ERP must provide advance notice to any licensee authorized to operate on adjacent spectrum, including public safety licensees authorized under Part 90 and regional planning committees identified in §90.527; and
    - Consolidate all rules for the Lower and Upper 700 MHz bands such that a single set of rules applies to both.
- These changes would establish uniformity between the Lower and Upper bands, ensure technology neutrality, and promote the wide deployment of broadband wireless technologies without risking harmful interference to 700 MHz licensees.