



Verizon Wireless
1300 I Street, N.W.
Suite 400 West
Washington, D.C. 20005

Phone 202 589-3785
Fax 202 589-3750

June 5, 2008

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

Re: *Ex Parte* Presentation
WT Docket No. 04-356 – “H Block”
WT Docket No. 07-195 – “AWS-3”

Dear Ms. Dortch:

On June 4, 2008, I met separately with Renee Crittendon in Commissioner Adelstein’s office and Bruce Gottlieb in Commissioner Copps’ office to discuss the above-captioned proceedings. In both of those meetings, I discussed Verizon Wireless’ concerns about the potential for certain uses of the H Block and AWS-3 spectrum to cause significant harmful interference to existing PCS and AWS licensees, and urged the Commission to adopt rules to prevent such interference.

With regard to the H Block, I noted that mobile transmissions in the 1915-1920 MHz band had the potential to cause significant harmful interference to tens (if not hundreds) of millions of wireless devices operating in the 1930-1990 MHz band, as evidenced by the substantial testing and analysis submitted into the record by CTIA more than three years ago. Based on that testing and analysis, Verizon Wireless joined Sprint and Nextel in proposing both power and out-of-band emissions (OOBE) limits that would reduce the risk of interference. (*See Ex Parte filed Feb. 8, 2005*). Specifically, the three companies proposed that power in the 1915-1917 MHz band be limited to 30 dBm, that power in the 1917-1920 MHz band be limited to 6 dBm, and that OOBE into the 1930-2000 MHz band be limited to -76 dBm/MHz. On May 30, 2008, Sprint-Nextel filed an ex parte with the Commission reiterating its support for this proposal. No other party has opposed this compromise solution, and we urge its adoption.

Marlene H. Dortch
June 5, 2008
Page 2

With regard to AWS-3, I noted that mobile transmissions in some segments of the 2155-2180 MHz band had the potential to cause significant harmful interference to operations in the 2110-2155 MHz AWS-1 band. This interference problem is essentially the same as that affecting the H Block, but is more severe due to the lack of any guard band. I noted the considerable efforts made by the U.S. Government and industry over more than a decade to establish a global identification of the 2110-2170 MHz band for advanced wireless services, to secure an allocation of that spectrum for such uses in the U.S., and to promote the development of equipment based on such harmonized frequency arrangements. The harmonized use of spectrum around the world is a key driver in reducing the cost of equipment and in facilitating roaming from region to region, and was one of the principle reasons the U.S. Government made the decision to allocate this spectrum for AWS. That reasoning is still valid, and should not be abandoned now that the AWS band has been licensed and deployment is progressing. However, even if the Commission were to establish frequency arrangements that are unique to the U.S., forcing U.S. licensees to purchase equipment that is limited to a smaller U.S. market, that equipment would still be subject to significant interference from certain uses of the AWS-3 band. We urge the Commission to promote the continued development of AWS by establishing rules that will prevent harmful interference to AWS-1 licensees.

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 question regarding this matter to the undersigned.

Respectfully submitted,

VERIZON WIRELESS

By: /s/ Donald C. Brittingham
Donald C. Brittingham
Director – Wireless / Spectrum Policy

cc: Renee Crittendon
Bruce Gottlieb