



Donald C. Brittingham
Assistant Vice President
Spectrum Policy

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

Phone 202 589-3785
Fax 202 589-3750

April 21, 2009

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

Re: ***Ex Parte Presentation***
PS Docket No. 06-229; WT Docket No. 06-150

Dear Ms. Dortch:

On April 20, 2009, Samir Jain, of Wilmer Cutler Pickering Hale and Dorr LLP, and the undersigned met with David Furth, Erika Olsen (by phone), Tim Peterson, Jeff Cohen, and Carol Simpson of the Public Safety & Homeland Security Bureau, and Margaret Weiner, Paul D'Ari, and Peter Trachtenberg of the Wireless Telecommunications Bureau to discuss the above-captioned proceedings.

We discussed Verizon Wireless' position on the 700 MHz D Block. We noted the company's support for public-private partnerships in addressing public safety's communications needs, and noted that the best means for establishing such partnerships would be by establishing a framework consistent with the principles outlined in the attachment.

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.

Sincerely,

/s/ Donald C. Brittingham
Donald C. Brittingham

cc: David Furth
Erika Olsen
Tim Peterson
Jeff Cohen
Carol Simpson
Margaret Weiner
Paul D'Ari
Peter Trachtenberg

Establishing a Public-Private Partnership to Meet Public Safety's Communications Needs

A public-private partnership is more likely to succeed if it is a regional approach that is driven by state and local public safety interests. To achieve such an objective, public safety should be given: (1) the spectrum; (2) the funding; and (3) a solid national plan to implement this strategy. The plan should follow four interdependent principles:

- 1. The 700 MHz D Block should be reallocated to Public Safety.**
 - ❖ A reallocation would provide public safety with access to sufficient spectrum to meeting its current and future needs.
 - ❖ It would provide public safety with direct control over how the spectrum is used.
 - ❖ A reallocation requires Congressional action, and Verizon Wireless believes that Congress should act promptly to reallocate the spectrum.
- 2. The D Block and the adjoining public safety “broadband” spectrum should be licensed to public safety agencies on a state/local or regional basis.**
 - ❖ A “one-size-fits-all” national approach would not accommodate public safety’s diverse needs as well as one specifically designed by local interests.
 - ❖ Direct assignment of the spectrum to state/local or regional entities will enable them to have greater control over network design and operations, based on local factors such as demographics, public safety needs, and existing commercial assets.
- 3. A national technical framework should be established that will ensure nationwide interoperability.**
 - ❖ Nationwide interoperability does not require a single, national network.
 - ❖ The establishment of national technical standards and the use of IP-based technologies will ensure that regional IP networks work together as one, i.e., a “network of networks.”
- 4. Public safety should be free to select their commercial partner(s) using an RFP process or similar approach to best meet their individual needs.**
 - ❖ The auction approach requires public safety to commit to a single model that may not satisfy their individual needs.
 - ❖ Establishing local or regional partnerships that are tailored specifically to meet the needs of individual public safety agencies is more likely to achieve the nation’s overarching objectives.

The advantages of this approach are straightforward. Public safety gets:

- More control over the spectrum, how networks are built, and who they partner with;
- Cost savings from partnering with operators with significant existing investments;
- Quicker deployment because commercial networks are already being built; and
- Interoperability for their future broadband networks.