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March 5, 2010

Ex Parte

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

Re: Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band, PS Docket No. 06-229; Service Rules for the 698-746, 747-762 and 777-792 MHz Bands, WT Docket No. 06-150; Petition for Rulemaking Regarding the Need for 700 MHz Mobile Equipment to be Capable of Operating on All Paired Commercial 700 MHz Frequency Blocks, RM-11592

Dear Ms. Dortch:

On March 4, 2010, Donald Brittingham, Vice President – Wireless Policy, Kathleen Grillo, Senior Vice President, Federal Regulatory Affairs, and the undersigned met with James A. Barnett, Jr., Chief, and Jennifer Manner and David Furth, Deputy Chiefs, of the Public Safety & Homeland Security Bureau.

We discussed Chairman Genachowski's recent announcement of his intention to recommend the development of a nationwide interoperable public safety broadband network in the 700 MHz band. Consistent with previous filings in this proceeding, Verizon reiterated its support for construction of such a network and for rules that would promote effective partnerships with commercial providers. We also reiterated, however, our continued support for Congressional action to re-allocate the 700 MHz "D block" for public safety use. This approach would provide public safety entities with access to sufficient spectrum and direct control over its use, thus ensuring that the D block is used to meet their expanding communications needs.

Regardless of whether the D block is re-allocated or auctioned, however, Verizon stated its intention to work with public safety to meet its particular needs for roaming in the 700 MHz band and priority access. Verizon cautioned that requirements relating to roaming, priority access, and devices operating in the D block and elsewhere in the 700 MHz band raise technical challenges that the Commission must take into account before imposing any such requirements. In particular, we noted the company's concerns about a requirement that all 700 MHz devices be required to operate over the entire 700 MHz band (Upper and Lower bands). Such a requirement would impede the deployment of broadband mobile devices generally and public safety broadband devices in particular.

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We also discussed the pending 700 MHz Public Safety waiver requests. As noted in Verizon's previous filings, we recommend prompt action on those requests and the establishment of a national framework that will ensure interoperability across the country. In that regard, we noted our general support for the proposed Emergency Response Interoperability Center (ERIC). As representatives from the public safety community stated in the FCC's recent ERIC Forum, however, it is important that the ERIC be implemented in a manner that is streamlined, avoids duplication of activities performed by other organizations, and promotes prompt deployment of the public safety broadband network.

Pursuant to section 1.1206(b) of the Commission's rules, an electronic copy of this letter is being filed for inclusion in the above-referenced dockets.

Sincerely,

A handwritten signature in black ink, appearing to read "Jonathon L. Stein". The signature is written in a cursive, flowing style.

cc: Jamie Barnett
Jennifer Manner
David Furth