

Tamara Preiss
Vice President
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July 19, 2011

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Ex Parte

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

Re: Service Rules for the 698-746, 747-762, and 777-792 MHz Bands, WT Docket No. 06-150; Request for Licensing Freezes and Petition for Rulemaking to Amend the Commission's DTV Table of Allocations to Prohibit the Future Licensing of Channel 51 Broadcast Stations and to Promote Voluntary Agreements to Relocate Broadcast Stations From Channel 51, RM 11626

Dear Ms. Dortch:

On July 15, John Scott and I met with the following staff from the Wireless Telecommunications Bureau to discuss the above-captioned proceedings: Jim Schlichting, Paul Murray, and Tom Peters from the WTB front office; Nese Guendelsberger, Peter Trachtenberg, Bill Stafford, and Jerry Pryor from the Spectrum and Competition Policy Division; and Roger Noel, Lloyd Coward, and Keith Harper from the Mobility Division.

We discussed challenges faced by Lower 700 MHz A block licensees such as Verizon Wireless in deploying services in the A block due to the presence of TV broadcast stations in channel 51 and the potential for additional stations to obtain licenses to operate on that channel. We explained that the Commission's rules requiring wireless licenses to accord interference protection to Channel 51 operations effectively preclude A block licensees from providing service in certain geographic markets. We also urged the Bureau to implement an immediate freeze on the acceptance, processing, and grant of applications for new TV facilities on Channel 51 or requests by existing licensees to relocate to Channel 51. We noted that a freeze would not affect incumbent channel 51 licensees. We also discussed the need for clarity regarding penalties for failure to meet build-out requirements for both the A and B blocks of 700 MHz spectrum. In that regard, we noted that a number of parties had filed petitions for reconsideration asking the Commission to clarify the circumstances under which licensees might face penalties, such as fines and forfeitures, in addition to a two-year reduction in license term.¹

¹ See, e.g., *Service Rules for the 698-746, 747-762, and 777-792 MHz Bands*, WT Docket No. 06-150, Petition of MetroPCS Communications, Inc. for Clarification and Reconsideration (filed Sept. 20, 2007), at 6-10; Blooston Rural Carriers Petition for Partial Reconsideration and/or Clarification (filed Sept. 24, 2007), at 11-18.

Marlene H. Dortch
July 19, 2011
Page 2 of 2

This letter is being filed electronically pursuant to Section 1.1206 of the Commission's Rules. Should you have any questions regarding this letter, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "James L. Green". The signature is written in a cursive style with a large initial "J" and a long, sweeping underline.

cc: (by e-mail)
Jim Schlichting
Paul Murray
Tom Peters
Nese Guendelsberger
Peter Trachtenberg
Bill Stafford
Jerry Pryor
Roger Noel
Lloyd Coward
Keith Harper