

Tamara Preiss  
Vice President  
Federal Regulatory Affairs



1300 I Street, NW, Suite 400 West  
Washington, DC 20005

Phone 202 515-2540  
Fax 202 336-7922  
tamara.preiss@verizon.com

January 25, 2012

**Ex Parte**

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

**Re: 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 January 23, 2012, John Scott, Bill Wallace, Cathy Hilke, and Tamara Preiss of Verizon met with Jim Schlichting, Tom Peters, Paul Murray, Nese Guendelsberger, and Nicole McGinnis of the Wireless Telecommunications Bureau. The purpose of the meeting was to discuss issues related to interoperability in the 700 MHz band that the Commission stated it intends to take up in a forthcoming rulemaking proceeding.<sup>1</sup>

We suggested that the Commission should focus the proceeding on working with the wireless industry to resolve the technical challenges associated with deployment of mobile wireless services in the Lower 700 MHz spectrum band, including the requirement that mobile licensees afford interference protection to broadcast TV services on channel 51 and the effect of operation of high power broadcast services in the Lower D and E blocks.<sup>2</sup> Indeed, the Commission recognized these interference concerns when it conditioned AT&T's acquisition of Lower 700 MHz D and E Block licenses from Qualcomm on AT&T's compliance with technical limitations on its use of that spectrum designed to reduce the risk of interference to other Lower 700 MHz licensees.<sup>3</sup> We noted the pending petition for rulemaking filed by CTIA and the Rural Cellular Association seeking Commission assistance to facilitate the voluntary relocation of TV broadcast stations from channel 51.<sup>4</sup>

---

<sup>1</sup> See *Application of AT&T Inc. and Qualcomm Inc. for Consent to Assign Licenses and Authorizations*, WT Docket No. 11-18, Order, FCC 11-188, para. 71 (rel. Dec. 21, 2011)(*Qualcomm Order*).

<sup>2</sup> See Letter from Joan Marsh, AT&T, to Marlene T. Dortch, FCC, WT Docket No. 11-18 (filed Dec. 21, 2011).

<sup>3</sup> *Qualcomm Order*, paras. 61-68.

<sup>4</sup> 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 (filed March 11, 2011).

Commission efforts to help resolve these interference issues will facilitate the development of devices using the Lower 700 MHz spectrum.<sup>5</sup> As a result, no Commission-mandated interoperability for the 700 MHz bands would be necessary.<sup>6</sup> Providers would have the flexibility to deploy devices including the Lower and/or Upper 700 MHz bands, as well as other spectrum bands, to fit their business plans, consistent with the Commission's existing policies.<sup>7</sup>

We also urged the Commission to limit the proceeding to the Lower 700 MHz spectrum band and to resist calls for consideration of broader "interoperability" mandates. We explained that interoperability between the Lower 700 MHz band and the Upper 700 MHz band – as well as other bands – presents additional and entirely different challenges than the interference issues discussed above. The Lower and Upper 700 MHz bands cannot be incorporated into a single duplexer because of the large separation between the uplink spectrum in each band and because the uplink and downlink spectrum are reversed between the two bands.<sup>8</sup> Mobile devices can support only a limited number of duplexers. A mandate to include both Upper and Lower 700 MHz bands in a single device may prevent device manufacturers from designing devices that meet the needs of wireless consumers. If, however, the Commission decides to consider interoperability beyond the Lower 700 MHz band, it should do so only in a Notice of Inquiry, and it should not limit that inquiry to the Lower and Upper 700 MHz bands.

This letter is being filed electronically pursuant to Section 1.1206 of the Commission's Rules. Please contact me if you have any questions.

Sincerely,



Attachment

cc: (via e-mail)  
Jim Schlichting  
Tom Peters  
Paul Murray  
Nese Guendelsberger  
Nicole McGinnis

---

<sup>5</sup> See Letter from Joan Marsh, AT&T, to Marlene T. Dortch, FCC, WT Docket No. 11-18 (filed Dec. 22, 2011).

<sup>6</sup> As Verizon Wireless previously explained, there is no legal basis to impose such a mandate. See *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, Comments of Verizon Wireless, at 16-27 (filed March 21, 2010).

<sup>7</sup> See *id.* at 14-15.

<sup>8</sup> Verizon used the attached band plan diagram to illustrate these points. See *id.* at 4-7.



# Lower 700 MHz and Upper 700 MHz Spectrum Bands

