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February 13, 2012

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th 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 February 9, 2012, I spoke by telephone with Rick Kaplan, Chief of the Wireless Telecommunications Bureau. We discussed issues related to interoperability in the 700 MHz band that the Commission stated it intends to take up in a forthcoming rulemaking proceeding.¹ I reiterated Verizon's opposition to any regulatory mandate to include particular chipsets in wireless devices, and I explained that the Commission lacks a legal basis to impose such a mandate.² I also explained, however, that Verizon fully supports commercial development of Band Class 12 devices, and we will continue to support Commission actions to resolve interference issues that have slowed deployment in the Lower 700 MHz A block and affected development of Band Class 12 devices. Because actions addressing interference issues would spur evolution of the device market toward full Lower 700 MHz interoperability, Verizon encourages the Commission to seek comment on those actions in the new rulemaking.

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,

A handwritten signature in black ink, appearing to read "Tamara Preiss".

cc: (via e-mail)
Rick Kaplan

¹ 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*).

² See Letter from Tamara Preiss, Verizon, to Marlene Dortch, FCC, RM-11592 (Jan. 25, 2012); *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).