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

March 15, 2012

Re: Notice of *Ex Parte* Presentation, RM-11592

Dear Ms. Dortch,

On Wednesday, March 14, 2012, I spoke by telephone with Rick Kaplan, Bureau Chief of the Wireless Telecommunications Bureau, regarding the Notice of Proposed Rulemaking in the above-captioned proceeding scheduled for consideration at the next Open Meeting.

During our discussion, I indicated that while the Commission's initial focus on interoperability in the Lower 700 MHz band is understandable, the forthcoming item should not foreclose consideration of interoperability across the full range of the Lower and Upper 700 MHz bands. However, the importance of continuing to develop the record on that broader question notwithstanding, the Commission should move forward quickly with the pending item and subsequent implementation of interoperability requirements for the Lower 700 MHz band. Such requirements would promote competition in two important ways: enabling deployment by A Block licensees by improving access to competitive handsets; and facilitating customer movement between carriers with compatible equipment, not proprietary band class radios.

I also mentioned Free Press's agreement with a position articulated by Vulcan Wireless in an *ex parte* submission in this docket on March 12, 2012: namely, that potential interference concerns for operations within the A Block do not "impact[] the viability for interoperability across the Lower 700 MHz" band. Even assuming (but not conceding) that harmful interference concerns might persist for some A Block licensees, such concerns still would not preclude pro-competitive interoperability requirements and rationalization of Lower 700 MHz band classes.

Sincerely,

/s/ Matthew F. Wood

Matt Wood
Policy Director
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cc: Rick Kaplan