

Request For 700 MHZ Interoperability

WT Docket (12-69)

To The FCC:

I strongly request the Federal Communications Commission to implement the proposed interoperability requirements in its notice of proposed rulemaking as soon as possible meaning within the next couple months well in advance of the November elections. That means no later than August 31st, 2012 but preferably anytime before that date. As I have made clear in my statements of record interoperability is fair for consumers and is perfectly reasonable. I have also provided comments supportive of other measures to spur competition in the wireless market including but not limited to wholesale open access mandates and repeatedly made clear my position favoring Network Neutrality also for wireless services and Title II reclassification of broadband. I firmly believe 700 MHz interoperability which some wanted the FCC to address as part of its ruling on approving the transfer of unused Qualcomm spectrum to AT&T should be enacted for the benefit of users and innovators. An open communications marketplace benefits smaller competitors. Handset exclusivity is no good for smaller carriers.

More spectrum is also needed for the smaller carriers. AT&T and Verizon don't need more spectrum they want to hoard all of it to prevent smaller competitors from accessing new spectrum. For that reason any spectrum transaction involving AT&T Mobility or Verizon Wireless which sees them acquiring more spectrum should if approved be conditionally done so with strict build out requirements to ensure they can't just sit on the spectrum and warehouse it to deny competitors from accessing more spectrum.