

In the Matter of 700 MHz Interoperability (12-69) Request Device Carrier Interoperability:

I request the FCC to enact interoperability rules for carriers using 700 MHz spectrum to make devices work across networks. When Apple first launched the iPad they announced there will be 2 model configurations iPad WIFI and iPad WIFI + 3G. The WIFI only model could only connect to the Internet over a WIFI connection. The WIFI + 3G connection could connect though over either WIFI or a cellular connection. Initially the only carrier whose 3G network the iPad could work with was AT&T.

The 3G based models had a built-in 3G chip made to work with AT&T's GSM based 3G network. So 3G capabilities have been built-in to Apple's 3G models of the iPad and iPad 2. However, interoperability has not existed in the devices. As noted the original 3G iPad was AT&T exclusive. Verizon developed a workaround for users of iPad 3Gs with built-in GSM based compatibility for AT&T's 3G network to access their CDMA network.

When Apple did make the iPad 2 available via 3G on Verizon Wireless they had to manufacture a 3G model using a CDMA based 3G chip designed for Verizon Wireless access. If you own a 3G iPad 2 built for AT&T's network and decide to switch to Verizon Wireless its not so easy. You have to buy a new iPad built for use with Verizon's 3G network. Just like when Apple finally delivered the iPhone 4 to

Verizon ending AT&T's handset exclusivity on the iconic Apple smart-phone and users of AT&T GSM based iPhones discovered they needed a new CDMA based model for use with Verizon Wireless the iPad tablet has its own interoperability issues.

Suppose you buy a 3G capable GSM based iPad 2 but later want to have access to Verizon's 3G network you have to buy a brand new 3G iPad for Verizon Wireless and then sign up for a data plan from Verizon for your new iPad. AT&T iPad users have to have an AT&T compatible iPad built for their network and to sign up for an AT&T data plan for the iPad. With Apple's iPad 3 4G LTE connectivity is now available via the iconic Apple tablet for Verizon and/or AT&T's networks. Sprint, which now carries the iPhone 4S has not gotten the iPad, yet as they are still busy trying to build their 4G LTE network. Sprint is transitioning from its failed WIMAX based 4G network to an LTE network for 4G service. Having to have different iPad models for different carriers could get very expensive. What if someone buys a model for AT&T but later decide they want to switch to Verizon there is a barrier to entry – the cost of buying a new iPad built just for Verizon's network. Suddenly your existing 3G iPad has become useless because of its inability to connect to the network you want to use.

Realizing how expensive switching from an AT&T based iPad to a Verizon iPad would be it should make perfect sense for the FCC to require 700 MHz interoperability. Ending handset exclusivity as described above would also benefit smaller carriers, as T-Mobile USA has made clear when they petitioned the FCC on

interoperability. T-Mobile made it clear that having interoperability makes it easier for smaller carriers to compete with giants AT&T Mobility and Verizon Wireless.