



Federal Communications Commission
Washington, D.C. 20554

May 15, 2012

John T. Scott, III
Vice President & Deputy General Counsel
Verizon Wireless
1300 I Street, NW, Suite 400 West
Washington, DC 20005

Re: Applications of Cellco Partnership d/b/a Verizon Wireless, SpectrumCo, LLC, and Cox TMI Wireless, LLC for Commission Consent To Assign AWS-1 Licenses (WT Docket No. 12-4)

Applications of Cellco Partnership d/b/a Verizon Wireless and Leap Wireless International Inc. for Commission Consent to the Exchange of Lower 700 MHz Band A Block, AWS-1, and PCS Licenses (ULS File Nos. 0004942973, 0004942992, 0004952444, 0004949596, and 0004949598)

Dear Mr. Scott,

On April 18, 2012, Verizon Wireless issued a Press Release announcing that it plans to conduct “an open sale process for all of its 700 MHz A and B spectrum licenses in order to rationalize its spectrum holdings.”¹ Verizon Wireless also stated, however, that such a sale would be “contingent” on the close of Verizon Wireless’s pending purchases of Advanced Wireless Service (AWS) licenses from SpectrumCo, LLC (“SpectrumCo”), Cox TMI Wireless, LLC (“Cox”), and Leap Wireless International Inc. (“Leap”).² We seek additional information with regard to Verizon Wireless’s announcement, as described below. We request that you provide the Wireless Telecommunications Bureau with your response by May 22, 2012.

1. Verizon Wireless obtained Lower 700 MHz A and B Block licenses at auction in 2008, covering a population of approximately 175 million. According to interim status reports filed by Verizon Wireless in January 2012,³ Verizon Wireless has not yet deployed service in the Lower 700 MHz band.

- In light of the fact that Lower 700 MHz A and B Block licensees are required to build out a specified portion of their licenses by June 2013 or face a reduction in their license term, what steps to date, if any, has Verizon Wireless taken to deploy mobile services using the Lower 700 MHz A or B Block licenses (either or both)? On what timetable

¹ Press Release, “Verizon Wireless to Conduct Spectrum License Sale” (Apr. 18, 2012), <http://newscenter.verizon.com/press-releases/verizon/2012/verizon-wireless-to-conduct.html> (Press Release).

² *Id.*

³ See, e.g., Cellco Partnership (“Verizon Wireless”), 700 MHz Interim Performance Status Report, Call Sign WQJQ696 (Jan. 10, 2012), <http://wireless2.fcc.gov/UlsApp/UlsSearch/licenseAdminSum.jsp?licKey=3060323#>.

has Verizon Wireless been planning to deploy mobile service in these Lower 700 MHz spectrum blocks?

- Please describe Verizon Wireless's current assessment of the Lower 700 MHz A Block challenges that Verizon Wireless previously identified in the instant proceeding⁴ and other proceedings.⁵

2. In the Press Release, Verizon Wireless states that its plan to sell these licenses is contingent upon the close of its pending purchases of AWS licenses from SpectrumCo, Cox, and Leap.

- Please explain the relevance, if any, of Verizon Wireless's announced sale of its Lower 700 MHz spectrum to the Commission's consideration of Verizon Wireless's proposed acquisition of this AWS spectrum from SpectrumCo, Cox, and Leap.
- Please describe any and all efforts Verizon Wireless has undertaken to sell its Lower 700 MHz spectrum licenses prior to the Press Release, including time frames.
- Would Verizon Wireless abandon its plans to sell its Lower 700 MHz licenses if the Commission does not consent to the sale of all of the AWS licenses at issue to Verizon Wireless?

Your responses should be filed with Marlene H. Dortch, Secretary, Federal Communications Commission, in WT Docket No. 12-4. In addition, the Comment Public Notice and the Protective Orders in this proceeding require the submission of multiple copies of all *ex parte* and other filings submitted in this proceeding. The Wireless Telecommunications Bureau also should receive, at a minimum, two copies of all paper filings. If you submit information pursuant to the Protective Orders issued in this case, you should deliver to John Spencer of the Wireless Telecommunications Bureau two copies of the unredacted documents marked "Confidential Information - Subject to Protective Order in WT Docket No. 12-4 before the Federal Communications Commission" or "Highly Confidential Information - Subject to Second Protective Order in WT Docket No. 12-4 before the Federal Communications Commission," as applicable, and two copies of the redacted documents marked "Redacted - For Public Inspection." For any electronic filings made using the Commission's Electronic Comment Filing System ("ECFS"), parties also should serve the documents via e-mail to Sandra Danner, sandra.danner@fcc.gov; Joel Taubenblatt, joel.taubenblatt@fcc.gov; and Joel Rabinovitz, joel.rabinovitz@fcc.gov.

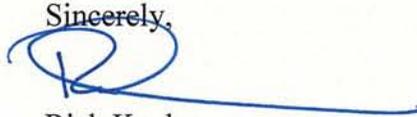
⁴ See Verizon Wireless-SpectrumCo Application, File No. 0004993617, Public Interest Statement, Declaration of William H. Stone, WT Docket No. 12-4, at 12-13 ("While we hold various Lower Band 700 MHz licenses, this spectrum is not as suitable for our LTE capacity requirements, because among other factors, the spectrum cannot be deployed as efficiently (or at all) in many markets because of the presence of existing Channel 51 television broadcast options."). See also Joint Opposition, Exhibit 2, Supplemental Declaration of William H. Stone, WT Docket No. 12-4, March 2, 2012, at 25.

⁵ See, e.g., Letter from Tamara Preiss, Vice President, Federal Regulatory Affairs, Verizon Wireless, to Marlene H. Dortch, Federal Communications Commission, WT Docket No. 06-150 and RM-11592 (Sept. 1, 2011) at 1 (noting that the Commission's rules "effectively preclude A block licensees from providing service in certain geographic markets" and "[t]hese barriers to deployment have also impaired the development of equipment that operates in the Lower A block").

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If you have any questions regarding this matter, please contact Joel Taubenblatt at (202) 418-1513 or me at (202) 418-0600.

Sincerely,

A handwritten signature in blue ink, appearing to be 'Rick Kaplan', with a long horizontal flourish extending to the right.

Rick Kaplan
Chief, Wireless Telecommunications Bureau