

Verizon's offer has already raised eyebrows in private industry because it covers blocks of the 700MHz band that are currently incompatible with 700MHz handsets from both Verizon and AT&T. Those companies have long claimed that requiring interoperability would raise serious technical challenges, but smaller carriers — rural networks in particular — have demanded it, saying that they're unable to wield enough purchasing power on their own to launch competitive handsets without piggybacking on hardware commissioned by the larger players. The FCC has **recently agreed to look into it**, but hasn't issued a ruling.

I urge the FCC when it does make a decision to issue a ruling requiring interoperability in the 700 MHz band. I also urge the FCC to deny the Verizon SpectrumCo and Cox transactions because of the spectrum concentration and anti-competitive collusive joint operating entity agreements. Big Red's proposed conditional 700 MHz Lower A & B block spectrum sale contingent on approval of the controversial deal transferring spectrum from SpectrumCo LLC and Cox Communications to Verizon Wireless has interference problems that would not make it useful for some of the carriers rightly still opposing the deals. It's also worth asking has Verizon made any effort to use the existing AWS or 700 MHz spectrum it currently has (including the spectrum it proposes to sell in exchange for getting the AWS spectrum) or is it just sitting on that spectrum? Is it usable? What's the relationship between this sale and the desire to acquire SpectrumCo and Cox assets? Finally its worth asking would Verizon really abandon the sale if it is denied in its bid to acquire SpectrumCo and Cox assets?