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December 20, 2013

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Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Technology Transitions Policy Task Force, GN Docket 13-5; Policies Regarding Mobile Spectrum Holdings, WT Docket No. 12-269; Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, GN Docket No. 12-268

Dear Ms. Dortch:

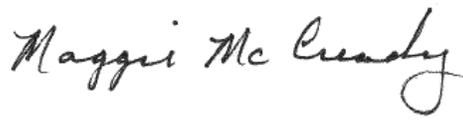
On Wednesday, December 18, 2013, Michael E. Glover and Kathleen M. Grillo of Verizon met with Commissioner Michael O’Rielly and Amy Bender, Wireline Legal Advisor. During the meeting they touched on the IP transition and spectrum issues.

They explained that consumers have long been transitioning to new broadband and IP-based wireless and wireline services. Verizon is employing the best technologies available to provide quality service to its customers. There are already fewer than a million served by copper in areas where Verizon has deployed fiber. They also discussed Verizon’s market-based incentives to enter into IP interconnection agreements for voice traffic. They explained that Verizon has now reached commercially negotiated agreements for IP interconnection for VoIP with three providers and expects other agreements will follow. As a result, the Commission should proceed cautiously when deciding any steps it may take related to the IP transition and not allow legacy regulations to impede the progress already underway.

With respect to spectrum, they urged the Commission to update the spectrum screen to include all suitable and available spectrum. They noted that Sprint is aggressively deploying its 2.5 GHz Broadband Radio Service and Educational Broadband Service spectrum to provide 4G LTE service, confirming that this spectrum must be added to the screen. The Commission should also add to the screen the 40 MHz of AWS-4 spectrum held by Dish. As it stands today, the spectrum screen cannot provide a meaningful tool to evaluate potential spectrum concentration issues because it omits substantial amounts of spectrum that are available for, and are actually being used to provide, commercial mobile broadband services.

They also discussed the broadcast incentive auction. The Commission should reject requests to restrict the ability of Verizon and AT&T to participate in the auction, which will reduce auction revenues and risk outright auction failure. Instead, it should adopt rules that encourage the broadest possible participation by broadcasters and wireless carriers alike, in order to maximize both the amount of spectrum re-purposed for mobile broadband and funding for FirstNet and deficit reduction.

This letter is being filed pursuant to Section 1.1206 of the Commission's rules. Should you have any questions, please do not hesitate to contact me.

A handwritten signature in black ink that reads "Maggie McCreedy". The signature is written in a cursive, flowing style.

cc: Amy Bender