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Vice President
Federal Regulatory Affairs

February 3, 2014

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
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Washington, DC 20554



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Re: Amendment of the Commission's Rules with Regard to Commercial Operations in the 1695-1710 MHz, 1755-1780 MHz, and 2155-2180 MHz Bands, GN Docket No. 13-185

Dear Ms. Dortch:

On January 30, Tamara Preiss and Catherine Hilke from Verizon met with John Leibovitz, Brian Regan, Blaise Scinto, Nancy Zaczek, and, by telephone, Peter Daronco of the Wireless Telecommunications Bureau to discuss the above-referenced proceeding. The discussion was consistent with our comments.¹

In particular, we stressed the following points:

- With the AWS-3 auction scheduled to begin as soon as September 2014, potential bidders need certainty well in advance of that date about the applicable spectrum aggregation rules.
- The FCC should continue to work with other government agencies to ensure that it can auction 1755-1780 MHz paired with 2155-2180 MHz. We discussed the need for potential bidders to know as much as possible about the schedule for re-locating federal users out of the 1755-1780 MHz band, as uncertainty on that issue will affect their valuation of the spectrum.
- Verizon supports the proposal in the NPRM to auction the AWS-3 spectrum on the basis of Economic Areas (EAs).² If, however, the Commission were to adopt smaller

¹ *Amendment of the Commission's Rules with Regard to Commercial Operations in the 1695-1710 MHz, 1755-1780 MHz, and 2155-2180 MHz Bands*, GN Docket No. 13-185, Comments of Verizon Wireless (filed Sept. 18, 2013); Reply Comments of Verizon Wireless (filed Oct. 28, 2013)

² *Amendment of the Commission's Rules with Regard to Commercial Operations in the 1695-1710 MHz, 1755-1780 MHz, and 2155-2180 MHz Bands*, GN Docket No. 13-185, Notice of Proposed Rulemaking, 28 FCC Rcd 11479, 11502-03, ¶ 52 (2013).

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license area sizes, it is imperative that auction participants be able to combine licenses through package bids. We also support auctioning the spectrum in a combination of 5x5 MHz and 10x10 MHz blocks.

- The Commission should adopt technical rules for the AWS-3 spectrum that are consistent with the rules for the AWS-1 band, including a mobile uplink power limit of +23 dBm EIRP, which will facilitate use of the AWS-3 spectrum and interoperability across AWS bands. We noted the opportunity for industry to promote handset interoperability through the development of a single band class that would cover AWS-1 and paired spectrum at 1755-1780 MHz and 2155-2180 MHz.
- Verizon supports interim build-out requirements pursuant to which an AWS-3 licensee must provide signal coverage and offer service to 40 percent of its *total* AWS-3 population within four years, and we oppose the proposal in the NPRM for automatic license termination for those licensees that fail to satisfy the final build-out requirement. Instead, the licensee should forfeit only the geographic portion of the license where it is not providing service. The more draconian penalty proposed in the NPRM would discourage investment by requiring licensees to forfeit the benefits of the build-out accomplished during the license term.

This letter is being filed pursuant to Section 1.1206 of the Commission's Rules. Should you have any questions, please contact the undersigned.

Sincerely,



cc: (via e-mail)

John Leibovitz
Brian Regan
Blaise Scinto
Nancy Zaczek
Peter Daronco