

Tamara Preiss
Vice President
Federal Regulatory Affairs

February 19, 2014

Ex Parte

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



1300 I Street, NW, Suite 400 West
Washington, DC 20005

Phone 202 515-2540
Fax 202 336-7922
tamara.preiss@verizon.com

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; Expanding the Economic and Innovation Opportunities of Spectrum through Incentive Auctions, GN Docket No. 12-268

Dear Ms. Dortch:

On February 14, Tamara Preiss, Charla Rath, and Patrick Welsh from Verizon spoke by telephone with John Leibovitz and Brian Regan of the Wireless Telecommunications Bureau about the above-referenced proceedings. We reiterated Verizon's support for the proposal in the NPRM to auction the AWS-3 spectrum on the basis of Economic Areas (EAs)¹ and emphasized the importance of package bidding. We also discussed the alternative proposal offered by the Competitive Carriers Association to license spectrum on the basis of partial economic areas (PEAs).² If the Commission were to adopt smaller license areas, these licenses must "nest" into existing EAs, and it is even more imperative that auction participants be able to combine licenses through package bids.

In addition, we urged the Commission to model its AWS-3 technical rules on the existing AWS-1 rules. Specifically, we proposed a single power limit of 1 watt EIRP for AWS-3 handsets³ and coordination distances based on varying handset transmit power levels.⁴

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, Notice of Proposed Rulemaking, 28 FCC Rcd 11479, 11502-03, ¶ 52 (2013).

² See *Wireless Telecommunications Bureau Seeks Comment on a Proposal to License the 600 MHz Band Using "Partial Economic Areas,"* GN Docket Nos. 12-268 and 13-185, Public Notice, 28 FCC Rcd 17255 (WTB 2013)(seeking comment on use of PEAs in 600 MHz and AWS-3 auctions).

³ See 47 CFR 27.50(d)(4).

⁴ See 47 CFR 27.1134.

Ms. Marlene Dortch
February 19, 2014
Page 2

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,

A handwritten signature in cursive script, appearing to read "Jonathan Stein".

cc: (via e-mail)

John Leibovitz
Brian Regan
