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March 14, 2014

Ex Parte

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

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; Policies Regarding Mobile Spectrum Holdings, WT Docket No. 12-269

Dear Ms. Dortch:

On January 30, Tamara Preiss and Catherine Hilke from Verizon met with Louis Peraertz, Legal Advisor to Commissioner Clyburn, to discuss the above-referenced proceedings.

We discussed Verizon's March 5, 2014 paper, which demonstrated that Sprint's Broadband Radio Service (BRS) and Educational Broadband Service (BRS) spectrum in the 2.5 GHz band is suitable and available for use and should be added to the spectrum screen.¹ 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 Commission should act quickly to add the remaining 2.5 GHz spectrum to the screen, as well as the AWS-4 and H block spectrum.

We also discussed the importance of 10x10 MHz spectrum blocks for the AWS-3 auction. LTE equipment is optimized for 20x20 MHz, and wider bandwidths (10x10 MHz and higher) enable licensees to provide greater throughput to more customers. Conversely, smaller channels do not take full advantage of the efficiencies of LTE. For this reason, Verizon has deployed LTE on 10x10 MHz channels using its Upper 700 MHz C block and AWS-1 spectrum holdings. We explained that carrier aggregation allows wireless providers to bond non-contiguous spectrum bands to create wider channels, but there are limits on the number of carriers that can be aggregated. Requiring carrier aggregation within the AWS-3 band to create a 10x10 MHz channel would limit the ability to aggregate other spectrum bands. The FCC should

¹ Letter from Kathleen Grillo, Verizon, to Marlene H. Dortch, FCC, WT Docket No. 12-269, at Attachment: The Evolution of the 2.5 GHz Band and Its Success for Mobile Broadband Demand a Spectrum Screen Refresh (filed Mar. 5, 2014).

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not fragment the AWS-3 band and instead should license it in two 10x10 MHz blocks and one 5x5 MHz block.

We also discussed license area size. Verizon supports the proposal in the NPRM to auction the AWS-3 spectrum on the basis of Economic Areas (EAs).² We also urged the Commission to allow package bidding in the auction. The risk of failing to acquire all licenses in a business plan (known as the “exposure problem”) is significant and may inhibit participation in the auction. If the Commission were to adopt smaller license area sizes, such as CMAs, package bidding is all the more imperative.

Finally, we discussed the desirability of technical rules for the AWS-3 spectrum that are consistent with the rules for the AWS-1 band, which will facilitate use of the AWS-3 spectrum and interoperability across AWS bands. We explained that Verizon opposes any equipment interoperability mandate and noted that work is already underway through the industry standards organization to develop a single band class that would cover AWS-1 and paired spectrum at 1755-1780 MHz and 2155-2180 MHz.

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)

Louis Peraertz

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); *see also 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).