



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

Phone 202 515-2533  
Fax 202 336-7858  
kathleen.m.grillo@verizon.com

February 21, 2012

**Ex Parte**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Room TW-A325  
Washington, D.C. 20554

**Re: In re Application of Cellco Partnership d/b/a Verizon Wireless and Cox TMI  
Wireless, LLC, WT Docket No. 12-4**

Dear Ms. Dortch:

On February 16, 2012, Tom Tauke, Executive Vice President – Public Affairs, Policy and Communications, Peter Davidson, Senior Vice President, Federal Government Relations, and the undersigned met with Commissioner Robert M. McDowell and Angela Giancarlo, Chief of Staff & Senior Legal Advisor, Wireless & International for Commissioner McDowell.

We discussed recent applications filed by Verizon Wireless seeking Commission approval to assign certain spectrum licenses from SpectrumCo and Cox TMI Wireless to Verizon Wireless. We reiterated that the proposed transaction is a sale of spectrum licenses only. It involves no assets, facilities, customers, or operating businesses. We summarized how the spectrum sale serves the public interest by moving spectrum that is not currently being used to serve consumers to a provider that will make efficient use of that spectrum. Verizon Wireless is currently deploying a state-of-the-art 4G LTE network nationwide. Prompt approval of these applications will benefit consumers by allowing Verizon Wireless to expand the capacity of its network to address skyrocketing customer demand and to continue to deliver our customers high quality, high-speed services. We also stated that an analysis using the spectrum screen that the Commission typically applies in this context confirms that the sale is in the public interest; the spectrum screen is not triggered in most of the markets included in the transaction.

We briefly discussed the separate commercial agreements between Verizon Wireless and the parties to the spectrum sale. We stated that the commercial agreements provide the parties to those agreements with the ability to act as agents selling one another's services. We stated that the FCC has never asserted authority to review such agreements and there is no basis to do so here.

We also discussed the continuing need for legislation to provide the FCC with authority to conduct voluntary incentive auctions. We expressed our support for the agreement between the

February 21, 2012  
Page 2

U.S. House of Representatives and Senate authorizing and funding the reallocation of broadcaster spectrum for commercial wireless use and the deployment of a nationwide interoperable public-safety broadband network.

Please contact me if you have any questions.

Respectfully submitted,

A handwritten signature in black ink that reads "Kathleen Gillh". The signature is written in a cursive style with a large initial 'K' and 'G'.