

VPS Engineering Memo

Lower 700 MHz Deadlines Approaching

ATTN:

**WY - 700 MHz Lower Band (Blocks A, B, and E) License Holders and
WZ - 700 MHz Lower Band (Blocks C and D) License Holders**

The End of License Term Construction deadlines for both WY and WZ license holders are coming due in June of 2019. Please note also that leased spectrum may have license terms ending prior to June, at which time the lease holder's End of License Term Construction filings will need to be made.

WY License Holders

In February of 2009, the Federal Communications Commission (FCC) released WT Docket 09-11, which extended the license expiration date and construction deadlines for the Lower 700MHz A, B, and E Block licenses by 116 days. Then in April of 2013, the FCC released Public Notice DA 13-680, which further extended the initial construction benchmark filing until December 13, 2013. Then just prior to this revised construction benchmark date, on October 29th 2013, the FCC released its Report and Order and Order of Proposed Modification, FCC 13-136, WT Dockets 12-69 and 12-332. FCC 13-136, WT Dockets 12-69 and 12-332 waived the interim deadline for the Lower 700MHz Band A Block licensees that fall within a 108-kilometer radius of an existing Channel 51 operation and further extended the initial construction benchmark filing for the remaining Lower 700MHz A, B, and E Block licensees until December 13, 2016. At that time, the End of License Term Construction Deadlines for the Lower 700MHz A, B, and E Block licensees were also extended to June 13, 2019.

WZ License Holders

Per 47 CFR 1.949 and 47 CFR 27.14, the FCC requires holders of Lower 700MHz C and D Block licenses to submit showings that their constructed networks are providing substantial service within their license areas. The FCC defines substantial service as "service which is sound, favorable and substantially above a level of mediocre service which just might minimally warrant renewal." The End of License Term Construction Deadlines for the Lower 700MHz C and D Block licensees are scheduled for June 13, 2019.

Both WY and WZ License Holders

With previous benchmark filings, the FCC had been satisfied with PDF versions of the predicted coverage accompanied with a detailed engineering statement. On October 16, 2015, the Commission released DA 15-1193, which specifies the revised format for filing the electronic maps associated with the Lower 700MHz construction benchmark filings, to be filed on or after October 16, 2015. And with the adoption of DA 15-1193, the FCC now requires that Lower 700MHz licensees' construction benchmark notification filings be comprised of a PDF map detailing the coverage, a more detailed technical narrative, accompanied by a shapefile map of the licensee's coverage. The FCC's Wireless Telecommunications Bureau added the shapefile map requirement to allow its staff to utilize software to readily and accurately compare, validate, and analyze the Lower 700MHz Blocks construction filings. These revised filing requirements have also been set as the precedent for all license filings going forward.

For Assistance

VPS has the expertise and tools to accurately model your existing wireless operations to create the advanced showings required by the FCC for the Lower 700MHz licensees' End of License Term Construction filings. If you have any questions or require any additional information, please feel free to contact any of the following VPS staff members for assistance:

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