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December 30, 2014

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: RM-11738

Ex Parte Presentation

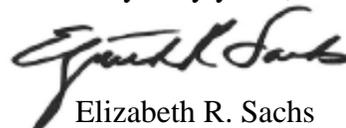
Dear Ms. Dortch:

On December, 29, 2014, Mark Crosby, President/CEO of the Enterprise Wireless Alliance (“EWA”), Morgan O’Brien, Vice-Chairman of Pacific DataVision, Inc. (“PDV”), and undersigned counsel met with Renee R. Gregory, Legal Advisor to Chairman Tom Wheeler, to discuss the above-referenced Petition for Rulemaking filed jointly by EWA and PDV. EWA and PDV discussed the history of the 900 MHz band and their proposal that the FCC realign this 30-year old 5/5 MHz allocation to provide a 3/3 MHz broadband segment for deployment of build-to-suit systems as requested by Business/Industrial/Land Transportation entities, with mandatory priority access for critical infrastructure industry entities. A copy of the presentation left with Ms. Gregory is attached hereto.

This letter is being filed electronically, in accordance with Section 1.1206(b) of the Commission’s Rules, 47 C.F.R. § 1.1206(b), for inclusion in the record in this proceeding.

Kindly refer any questions or correspondence regarding this matter to the undersigned.

Very truly yours,



Elizabeth R. Sachs

Attachment

cc: Renee R. Gregory (via email)

900 MHz Realignment
Filed by Enterprise Wireless Alliance and PDV
RM-11738

Background

- **Private Enterprise (PE) and Critical Infrastructure Industry (CII) entities have no dedicated spectrum available for broadband (BB) applications with assurance of priority access:**
 - Use commercial networks for certain non-critical operations, but security, reliability and coverage do not always meet requirements
 - Use unlicensed and/or shared spectrum for other less essential purposes
- **5 MHz of 900 MHz Part 90 spectrum (896-901/935-940 MHz) allocated for PE/CII/Specialized Mobile Radio (SMR) use almost 30 years ago:**
 - Narrowband (12.5 kHz bandwidth) channels used primarily in trunked systems
 - Two authorized license types whose sets alternate across the 5 MHz
 - SMR = 20 license sets with 10 channels in each set licensed across an MTA
 - PE/CII = 20 license sets of 10 channels in each set are site specific licenses
 - SMR blocks licensed by MTA were auctioned in 1995/96

PDV

- **PDV purchased 900 MHz licenses from Sprint in 3Q 2014 after Sprint de-activated iDEN network that used this spectrum intensively**
 - Holds most SMR geographic MTA licenses nationwide
 - Holds substantial number of PE/CII channels in major urban areas that Sprint had acquired when the FCC allowed channels to be converted to SMR
- **Near-term plan: Launch next generation PTT networks**
 - Initial narrowband deployment in top 20 metro areas
 - High site, high power networks - focus on traditional dispatch users
- **Long-term plan: Deploy build-to-suit broadband networks**
 - Priority access for critical infrastructure customers
 - Customers with custom advanced broadband needs and coverage requirements
 - Standard LTE low site, low power networks

Proposal

- **Proposal is to realign the 900 MHz band to consolidate all MTA and 40 site-based channels into contiguous 240-channel PE BB block (PEBB) to be used to provide build-to-suit BB systems with guaranteed priority access for PE/CII entities.**
 - PEBB allocation could accommodate two LTE channels
 - PEBB license to be held by entity with 15 or more SMR geographic licenses in the MTA (PDV in most, but not all, areas)
 - PEBB licensee responsible for costs of relocating incumbents to narrowband 900 MHz channels to create contiguous PEBB block and for providing incumbents with fully comparable facilities

Benefits & Challenges

- **Benefits**

- Allows already auctioned spectrum to migrate to next generation, higher efficiency, more advanced BB configuration
- Provides CII and other PE entities with BB option on already allocated spectrum with guarantee of priority access comparable to the access afforded Public Safety on FirstNet spectrum

- **Challenges – to be resolved in rulemaking proceeding**

- Ensuring non-interference from BB to adjacent in-band and out-of-band operations; working with various parties to address concerns
- Refining “comparable facilities” definition to ensure that incumbents electing to retain narrowband operations do not experience any degradation of service