

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Review of the Commission’s Rules)	WT Docket No. 17-200
Governing the 896-901/935-940 MHz Band)	
)	
Realignment of the 896-901/935-940 MHz)	RM-11738 (Terminated)
Band to Create a Private Enterprise)	
Broadband Allocation)	
)	
Amendment of the Commission’s Rules)	RM-11755 (Terminated)
to Allow for Specialized Mobile Radio)	
Services Over 900 MHz Business/Industrial)	
Land Transportation Frequencies)	
)	

COMMENTS OF M2M SPECTRUM NETWORKS, LLC

M2M Spectrum Networks, LLC (“M2M”) submits these comments in response to the *Notice of Inquiry* released by the Commission to review its rules governing the 896-901/935-940 band (“900 MHz Band”).¹ This band is designated and has systems in place for narrowband private land mobile radio (“PLMR”) communications by Business/Industrial/Land Transportation (“B/ILT”) licensees and Specialized Mobile Radio (“SMR”) providers.

Among other things, the *Notice of Inquiry* seeks comment on proposals made by M2M in a petition for rulemaking to increase operational flexibility and permit SMR systems to operate in the 900 MHz Band, provided that a system’s end users were themselves B/ILT eligible.²

¹ Review of the Commission’s Rules Governing the 896-901/935-940 MHz Band, *Notice of Inquiry*, 32 FCC Rcd. 6421 (2017) (“*Notice of Inquiry*”).

² M2M Spectrum Networks, LLC, Petition for Rulemaking, R-11755 (June 29, 2015); FCC, Wireless Telecommunications Bureau Seeks Comment on M2M Spectrum Networks Petition for

M2M filed its rulemaking petition after the Wireless Telecommunications Bureau dismissed applications of its affiliates to operate an SMR system in the 900 Band.³ Those applications were filed in late 2013 and early 2014.

Since the filing of its rulemaking petition to revise the 900 MHz eligibility rules more than two years ago (and the filing of its license applications almost four years ago), M2M has re-focused its business activities on use of the 815-817/860-862 MHz frequencies (“800 MHz Expansion and Guard Bands”).⁴ Unlike the 900 MHz Band, the 800 MHz Expansion and Guard Bands are expected to become available throughout the country and in major urban areas as a result of rebanding. These rebanded frequencies will likely become available soon after the Commission releases a decision in its pending Part 90 rules proceeding.⁵ M2M has concluded that the opportunity to operate in major markets within a reasonable amount of time will be an important factor for long-term success in the competitive Internet of Things marketplace.

Nevertheless, M2M has continued to investigate the future of business enterprise communications requirements and has concluded that a 900 MHz broadband allocation would be a valuable option for that user community.⁶ The concerns that have been raised in response to the Petition for Rulemaking filed by Pacific DataVision and the Enterprise Wireless Alliance⁷

Rulemaking to Allow Specialized Mobile Radio Services Over 900 MHz Business/Industrial/Land Transportation Frequencies, Public Notice, 30 FCC Rcd. 8468 (2015).

³ Spectrum Networks Group, LLC, *Order*, 30 FCC Rcd. 3509, 3515 ¶¶ 11-15 (2015) (“SNG Order”).

⁴ The 800 MHz Expansion Band is located at 815-816/860-861 MHz. The 800 MHz Guard Band is located at 816-817/861-862 MHz.

⁵ Amendment of Part 90 of the Commission’s Rules to Improve Access to Private Land Mobile Radio Spectrum, *Notice of Proposed Rulemaking*, 31 FCC Rcd. 9431 (2016).

⁶ See *Notice of Inquiry*, 32 FCC Rcd. at 6430-32 ¶¶ 26-40.

⁷ Enterprise Wireless Alliance and Pacific DataVision, Inc., Petition for Rulemaking, RM-11738 (Nov. 17, 2014).

proposing such an allocation can be addressed in this proceeding. M2M believes there will be a need for both the Internet of Things network it is deploying and broadband systems designed to address business and critical infrastructure rather than consumer service.

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Respectfully submitted,

/s/ _____
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