

VIA ELECTRONIC DELIVERY

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

**Re: Notice of Inquiry
WT Docket No. 17-200**

Dear Ms. Dortch:

The companies identified below embrace the Chairman's goals for the agency as described in his "First 100 Days" remarks at the American Enterprise Institute in May. As participants in the telecommunications marketplace and investors in pdvWireless, we were greatly encouraged to hear him identify expanding broadband capability, modernizing the FCC's rules, and promoting innovation across the communications industry as key priorities during his Chairmanship, priorities that undoubtedly are shared by his fellow Commissioners. All three of those objectives would be advanced by prompt Commission action in this proceeding. We urge the FCC to enable a new 900 MHz private carrier broadband service, one that would address the security, reliability and coverage requirements of utilities, other energy providers, and business enterprises of all types.

As long-term institutional investors, we have made significant investments in US companies nationwide, thereby furthering the building of infrastructure and fostering the creation of jobs in our economy. Our investment decisions, like this Commission's regulatory decisions, are focused squarely on a cost/benefit analysis. We invest in ideas, and the entrepreneurs who conceive them, when they are backed up with a solid business case; one that presents a meaningful commercial opportunity that can be implemented in a realistic timeframe. A broadband service like the 900 MHz private carrier broadband network proposed by EWA/PDV has job creation and growth potential that is not dependent on the already well-served consumer marketplace and meets the demanding requirements of business-critical services. If approved, we are confident it would employ people throughout the nation, serving critical infrastructure and other business enterprise users whose operating requirements demand broadband capabilities beyond what is available on consumer-oriented commercial networks.

The Chairman has committed this Commission to act promptly on proposals for new services and technologies. Coupled with the FCC's broad recognition of the critical importance of promoting innovation, this new approach will be particularly important to those considering investing in telecommunications ventures. Innovation often comes from new entrants to a marketplace, companies who identify an unserved need, a better way of meeting an existing requirement, or a technology breakthrough. But time delays are a leading cause of death to innovative companies that require regulatory approval. Whether caused by entrenched interests that fear disruption or a burdensome agency workload, no start-up can survive extended regulatory stasis. Thus, we are particularly pleased that this Commission recognizes that its own intention not to let proceedings languish is consistent with its statutory directive.

We recognize that the Commission still is in the information-gathering stage of this proceeding and hope that it will be able to complete the NOI phase promptly. We look forward to a record supporting our belief that the 900 MHz band can be modernized to permit broadband and narrowband systems to exist compatibly and thereby create a below-1 GHz broadband option designed to accommodate the specialized requirements of the businesses and services on which this country depends every day.

By: _____/s/_____

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