

Assured Wireless

Mission Critical Wireless™

September 27, 2017

SUBMITTED ELECTRONICALLY VIA ECFS

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

**Re: WT Docket No. 17-200
Ex Parte Letter**

Dear Ms. Dortch:

As a nascent high technology company dedicated to developing and providing mission-critical communications technology and products to targeted customers in Public Safety and First Responder organizations, as well as those in other related industries, we have a keen interest in ensuring that all bands available for use by or for the benefit of such targeted customer groups are optimized for maximum utilization and are ready to support technological advances. We support the proposed realignment of the 900 MHz band to create a private enterprise broadband allocation for the reasons described below.

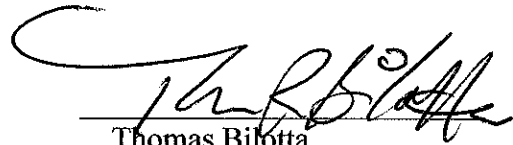
We are based in San Diego, were founded by long-time innovators in the digital wireless communications industry and have developed an advanced RF amplification technology that we intend to design into a range of wireless products, including high efficiency portable wireless hot spots and in-vehicle wireless routers. The unprecedented power efficiency of the technology makes possible small handheld portable or stationary wireless devices that provide the greatest range and reliable coverage on LTE networks while maintaining long battery life and low thermal dissipation. We look forward to developing a prototype high power user equipment hotspot unit adapted to incorporate EWA/PDV proposed 900 MHz broadband spectrum allocation, to demonstrate the benefits that our technology could bring to business enterprise and critical infrastructure entity users who have a need for such a customized and affordable coverage extension solution.

The next frontier in wireless communications unquestionably will involve further refinements and improvements to existing broadband LTE technology. While LTE technology has become a universally accepted standard in the commercial broadband wireless marketplace, there has been limited opportunity for business enterprise and critical infrastructure entities, to enjoy its functionality and economies of scale except as a customer on a commercial wireless network. That option is fine for consumer applications, but as these companies have explained to the FCC, they often have coverage, reliability, security, priority access and other requirements that are not met on today's commercial systems. A private carrier broadband wireless network, in a

band below 1 GHz where infrastructure costs are manageable, would offer these entities a business-targeted option that is sorely needed.

The Part 90 900 MHz band is well-suited for the type of realignment proposed by EWA/PDV. It has been available for more than 30 years but remains significantly underutilized outside of major metro areas. While all spectrum repurposing involves challenges and some degree of disruption, the relatively small number of incumbents will make this process less difficult in this band than in others. By contrast with the realignment experience in the 800 MHz band, where there were some 2500 licensees, including a number of large public safety systems, there are only a limited number of 900 MHz systems in each metro area and most are small, with the exception of some large utility operations that will require individualized treatment.

Members of the business and critical infrastructure community with broadband communications needs that exceed those of the "mass consumer market" should not be left behind as that consumer marketplace in the US and in other countries continues to migrate to standard issue commercial LTE broadband networks. LTE functionality in a system design tailored to the unique requirements of such business and critical infrastructure community members is critical for their continued competitiveness in a world economy. The Commission should move as quickly as possible to the next step in this proceeding.

A handwritten signature in dark ink, appearing to read 'Thomas Bilotta', is written over a horizontal line.

Thomas Bilotta

CEO

Assured Wireless Corp.

4250 Executive Square, Ste 200

La Jolla, CA 92037