



43130 Amberwood Plaza, Suite 210
South Riding, Virginia 20152
Main: 703-760-9507
Fax: 703-880-7555

SUBMITTED ELECTRONICALLY

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

**Re: WT Docket No. 17-200
Comments**

Dear Ms. Dortch:

As an engineering consulting firm, we've learned there's always a smarter, more efficient way to do things. Our company has a vital interest in ensuring that all spectrum bands are available to our clients and are optimized for maximum utilization and ready to support technological advances. It is for this reason that we support realignment of the 900 MHz band to create both a broadband and a narrowband allocation.

We've led many of our clients in an upgrade from conventional to trunked equipment because of the efficiency gains derived from multi-channel systems. For fourteen years, we've been delivering the context, strategy, and execution that fuels innovation—creating network efficiencies, optimizing technologies, and inventing solutions to the world's most difficult wireless problems. These significant enhancements have better shaped our clients' businesses, saving them time, money, and aggravation.

Our hands-on experience from hundreds of thousands of successful wireless implementations and a specialized knowledge of how legacy and modern network components intersect and interact, has led us to strongly believe that broadband LTE technology will be an ingredient in most future operations. It is a universally accepted standard in the commercial broadband marketplace, but American business enterprise and critical infrastructure entities can take advantage of its functionality and economies of scale almost exclusively as commercial network subscribers, at least if they require licensed spectrum. That option is fine for certain applications, but, as many companies have explained to the FCC, priority access and security, among other requirements, are not met on today's commercial systems. If approved for the proposed realignment recommended by EWA/PDV, the Part 90 900 MHz band is very well-suited for a secure and isolated broadband network offering, providing the much-needed private carrier option for enterprise use. We urge the Commission to proceed promptly to the next stage in this proceeding.

Name

SHERVIN GERAMI

C.E.O