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October 21, 2019

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

Re: EX PARTE NOTICE
WT Docket 17-200
Review of the Commission's Rules for the
896-901/935-940 MHz Band

Dear Ms. Dortch:

I am writing to summarize the substance of an ex parte presentation made by the undersigned, Ron Sellemi, and Marc Levante on behalf of Southern California Edison (SCE) to Aaron Goldberger on October 18, 2019. We stressed the importance to utilities of the broadband channel which could be made available as a result of this proceeding and the significant improvements in public safety, fire prevention, and system reliability that would be enabled by capabilities such as near-instantaneous shutoff of electrical current in the event of line breaks. We indicated that the benefits to the public of granting utilities access to this particular spectrum band at this time would surpass any other proposed usage, especially an award to a non-utility, non-CI, for-profit spectrum consolidator. We also indicated that the definition of a "complex system" for purposes of involuntary relocation should be broadened to extend to licensees with either twenty-five 900 MHz channels operational on their networks (as proposed in our Reply Comments) or twenty-five integrated sites.

Respectfully submitted,

FLETCHER, HEALD & HILDRETH, PLC

A handwritten signature in black ink, appearing to read "Donald J. Evans", written over a horizontal line.

Donald J. Evans
Counsel for Southern California Edison

cc: Aaron Goldberger