

1300 NORTH 17th STREET, 11th FLOOR  
ARLINGTON, VIRGINIA 22209

OFFICE: (703) 812-0400  
FAX: (703) 812-0486  
www.fhhlaw.com  
www.commlawblog.com

DONALD J. EVANS  
(703) 812-0430  
EVANS@FHHLAW.COM

October 21, 2019

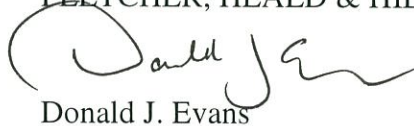
Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

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, John Bubb, Mac McKinney, Ron Sellemi, and Marc Levante on behalf of Southern California Edison (SCE) to Roger Noel, Jessica Quinley, Cari Hicks, Lloyd Coward and Amanda Huetinck 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 priority 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 discussed potential paths to utilities obtaining the license, including measures for freeing up currently unused or underused spectrum in the band. 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, as supported by most commenters.

Respectfully submitted,  
FLETCHER, HEALD & HILDRETH, PLC



Donald J. Evans  
Counsel for Southern California Edison

cc: Roger Noel  
Jessica Quinley  
Cari Hicks  
Lloyd Coward  
Amanda Huetinck