

Brian J. Raymond

*Director
Innovation Policy*

October 23, 2017

Submitted via FCC's Electronic Comment Filing System (ECFS)

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

Re: Ex Parte Filing; WC Docket No. 17-108; GN Docket No. 17-183;
GN Docket No. 14-177; WT Docket No. 17-200

Dear Ms. Dortch:

This is to advise that on Thursday, October 19, Robyn Boerstling, Vice President, Infrastructure, Innovation, and Human Resources Policy of the National Association of Manufacturers, William K. Keane, counsel for MRFAC, Inc., and the undersigned met with Commissioner Brendan Carr and his Chief of Staff, Jamie Susskind. Mrs. Boerstling and the undersigned addressed The National Association on Manufacturers' ("NAM's") position in the Commission's Open Internet proceeding. We stressed the NAM's support for open internet principles, but that the Title II regulatory regime currently in place hinders investment and is counter-productive for the spread of broadband infrastructure. The NAM appreciates the Commission's effort to make additional spectrum available for 5G applications. In this regard, we discussed the proliferation of connected devices in the products and on the shop floors of manufacturers and their prospective role in manufacturing productivity and competitiveness and the importance of a streamlined regulatory system to foster the growth of this technology.

NAM's representatives and Mr. Keane discussed the importance of preserving 900 MHz Business and Industrial/Land Transportation spectrum for private internal use by American business and industry. NAM and MRFAC members make extensive use of cellular services provided by carriers. However, such services are not a substitute for the highly specialized communications facilities utilized by manufacturers, such as factory floor automation, just-in-time delivery, and materials handling applications. Applications like these have transformed U.S. manufacturing in the past 20 years. We also underscored that geographic licensing is not suitable for manufacturers whose coverage needs will seldom, if ever, correspond with the pre-determined areas used as the basis for such licensing.

Any question regarding this ex parte filing, may be directed to the undersigned

Sincerely,



Brian Raymond

Cc: The Honorable Brendan Carr
Jamie Susskind

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