

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
PHI Service Company Requests for)	WT Docket No. 17-246
Extension or Waiver of Part 22 Paging)	
Performance Requirement)	

To: Chief, Wireless Telecommunications Bureau

**REPLY COMMENTS
OF
PHI SERVICE COMPANY**

PHI Service Company (“PHI”), in accordance with Section 1.45 of the Federal Communications Commission (“FCC” or “Commission”) rules, respectfully submits these Reply Comments in accordance with the Public Notice seeking comment on its requests seeking an extension or waiver of Part 22 paging performance requirements (the “Public Notice”)¹, as well as to the Comments filed in response to the Public Notice. PHI acknowledges the Comments in support filed by pdvWireless, Inc.²

PHI had planned to deploy systems authorized under the area-wide 931 MHz Paging Service licenses WQMS681, WQMS682, WQMS688 and WQMS689 and the UHF Paging Service license WQMT945 (the “Licenses”) in support of wide-area distribution automation and related smart grid applications of its affiliated electric utilities—Atlantic City Electric Company, Delmarva Power & Light Company, and Potomac Electric Power Company. Circumstances have changed. The current and projected requirements for these systems are being met by a broader deployment of fiber facilities and other area-wide and site-based licensed wireless networks that PHI has deployed

¹ Wireless Telecommunications Bureau Seeks Comment on PHI Service Company Requests for Extension or Waiver of Part 22 Paging Performance Requirements, WT Docket No. 17-246, Public Notice, 32 FCC Rcd 6958 (rel. Sept. 14, 2017) (“Public Notice”).

² See generally Comments of pdvWireless, Inc., WT Docket No. 17-246 (filed October 16, 2017).

in recent years. Although PHI made considerable progress in deploying the facilities authorized by the Licenses, the frequencies authorized by the Licenses are no longer critical to PHI's internal communications requirements. PHI understands the challenges the Commission faces in managing the scarce spectrum resources. Accordingly, PHI respectfully withdraws its Requests for Extension or Waiver and elects to return the Licenses to the Commission.

Respectfully submitted,

/s/

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