



May 23, 2019

**VIA ELECTRONIC FILING**

Honorable Ajit Pai, Chairman  
Honorable Michael O'Rielly, Commissioner  
Honorable Brendan Carr, Commissioner  
Honorable Jessica Rosenworcel, Commissioner  
Honorable Geoffrey Starks, Commissioner  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

RE: WT Docket No. 17-200, In the Matter of Review of the Commission's Rules Governing the  
896-901/935-940 MHz Band

Dear Chairman Pai and Commissioners O'Rielly, Carr, Rosenworcel and Starks:

Through the issuance of the Notice of Proposed Rulemaking in the above referenced proceeding the Commission has taken the first step in the transformation of the private land mobile radio communications industry. As the nation's businesses increase their reliance on data analytics and artificial intelligence to improve products and services, the need to exchange information with mobile employees and remote devices has eclipsed the capabilities of voice-based technology. Location information, machine to machine communications, network monitoring and control, and a myriad of mission critical applications require a new paradigm in land mobile radio. Realignment of the 900 MHz band will allow mission critical industries, such as water, gas, and electric utilities, as well as transportation and logistics companies to utilize a reliable network, based on international standards, to fulfill their missions in the most effective manner possible.

Mission Critical Partners, LLC is a leading consultant to public safety and critical infrastructure entities that will benefit from the regulatory innovation proposed by the Commission. While FirstNet will provide mission critical broadband service for first responders, no such solution exists for critical infrastructure entities. Our critical infrastructure client base includes some of the largest governmental and private sector entities in the United States. It is patently obvious to us that there is a demand for access to mission critical wireless communications networks provided as a service. Such services will allow prompt access to wireless networks without the need for lengthy design, budgeting, and implementation of a private network that serves as a distraction from the core business of the entity and does not offer the flexibility or application environment provided by broadband. Private LTE networks will allow user equipment and IoT devices to be procured with the economies of scale provided by a global marketplace.

Through the implementation of functions that are provided by 3GPP standard LTE networks, it is possible to provide interoperability between critical infrastructure 900 MHz and public safety broadband networks, either at the user equipment or network core levels. Data sharing between



utilities, telecommunications carriers, contractors, and public safety entities can be facilitated by such interoperability, addressing a need identified by the Commission in its May 2019 PS Docket Number 18-1339 report and recommendations “Hurricane Michael’s Impact on Communications: Preparation, Effect, and Recovery”.

Availability of 900 MHz private LTE networks will provide opportunities for innovation in software applications, wireless devices, and the provision of ancillary services that will stimulate investment and employment. The Commission is applauded for its vision in opening this proceeding and we encourage its prompt adoption to open the gates to investment in and transformation of the land mobile radio industry.

Sincerely,

Mission Critical Partners, LLC

A handwritten signature in black ink, appearing to read 'S. Neal', is written over the printed name.

Scott A. Neal, ENP

Vice President & Director of Wireless Services