31st May, 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

*Reference:* 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:

The Commission’s recent Notice of Proposed Rulemaking (NPRM) to re-align the 900 MHz band for broadband services is a significant, positive step forward for our company. Multi-Tech Systems, Inc. Is a vendor of wireless communications equipment that provides Industrial IoT embedded and device products, designed and manufactured in Mounds View, Minnesota. Our critical infrastructure client base includes utilities, Oil & Gas and Rail Transportation in the United States.

Those segments are now seeking secure, resilient dedicated networks and equipment that can be capitalized and deployed quickly with limited development costs. Having the 900 MHz band as a private cellular broadband option provides our clients access to spectrum without the complexity of spectrum sharing and without being priced out of access to spectrum by Mobile Network Operators who prefer more than 3 MHz bandwidth for their 4G-LTE and 5G-NR services. The 900 MHz band is included in the 3GPP band 8 specification and is therefore consistent with our customer’s preference for a standards based technology for wireless broadband communications. It would also enable us to expand our Private-LTE offerings into U.S.A Industrial, Energy and Transportation segments and continue the future development and constant innovation in wireless equipment at scale.

Moving forward, the 900 MHz band offers our clients an opportunity to pursue a range of capabilities and options that not only will help the Energy industry, but very likely will assist other industries that are similarly situated. Through the evolution of the Industrial IoT marketplace, the availability of private networks that can meet our safety and security needs and the global scale of LTE development, we believe that moving the 900 MHz band to market can be transformative.

We applaud the Commission for its efforts in improving spectrum access and utilization for industry to date and suggest that speed and options to both licensed and shared spectrum choices is key. Accordingly, we respectfully request that you move quickly to facilitate the retuning and clearing of this band so that the potential benefits of this broadband option are immediately available for our critical infrastructure clients.

Sincerely,

Multi-Tech Systems, Inc.