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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:

My company manufactures narrowband data systems, currently used by hospitals and public safety for mission-critical alerting, monitoring, and primary dispatch. In many cases, these systems operate in the 896-901/935-940 MHz band.

Generally, we do not oppose the NPRM to re-align the band for broadband services, subject to careful consideration of interference issues, an equitable means to protect incumbent licensees, and a plan that preserves a reasonable number of narrowband channels for continued B/ILT use. However, in this rulemaking, we urge the commission to also allow B/ILT data systems to operate on the narrowband portion of the band, on a co-primary basis, for machine-to-machine data communications.

Narrowband data offers important, unique benefits to hospitals and other mission-critical private enterprise where high reliability and availability are more important than aggregate bandwidth. For example, a high-power, narrowband data system and a single 12.5KHz channel pair can provide a cost-effective, deterministic, and reliable hospital-wide wireless backbone for bedside alarm monitoring and clinical alerting. Providing these same functions with Wi-Fi, a commercial carrier, or even a private broadband (or NB-IOT) system, would increase cost, complexity, and risk. Making 900MHz narrowband channels available for primary data use would offer more flexibility for these types of data applications, both for manufacturers and users, and, in the case of hospitals, would improve patient safety.

Again, we urge the commission to extend the flexibility contemplated by this NPRM to the *narrowband* part of the reconfigured 896-901/935-940 MHz band, by allowing co-primary data usage on narrowband channels. This action would significantly increase the overall flexibility of the band and serve the public interest.

Sincerely,

A handwritten signature in black ink, reading "James M. Dabbs III".

James M. Dabbs III, President
Critical Response Systems, Inc.