

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

In the Matter of:

Review of the Commission's Rules Governing  
the 896-901/935-940 MHz Band

WT Docket No. 17-200

**To: The Commission**

**COMMENTS OF Lockard and White, Inc.**

Lockard & White, Inc. (L&W) thanks the Chairman and Commissioners of the Federal Communications Commission (FCC) for the opportunity to respond to WT Docket No. 17-200, In the Matter of Review of the Commission's Rules Governing the 896-901/935-940 MHz Band (the NPRM) . L&W is in support of the NPRM and specifically endorses the reallocation of a band of spectrum for use by Critical Infrastructure Industry (CII) for broadband networks but would encourage the FCC to establish a specific testing protocol to mitigate some of the potential challenges of this process.

L&W is an engineering and technical consulting services firm that specializes in telecommunications engineering. The firm has been a provider of services for 35 years to companies in the electric utility, gas and oil energy and railroad transport sectors. L&W has significant experience engineering and managing the implementation of Land Mobile Radio systems as well as broadband networks supporting voice and data applications for companies that operate in the aforementioned sectors, covering the 220, 450, 700, 800 and 900 MHz frequency bands, amongst others. As a consultant, L&W has a wide range of experience and direct knowledge of the equipment and manufacturers of the various radio technologies and systems. Also, as a part of the consultancy practice, L&W provides license acquisition and management services in the mobile radio bands listed above.

L&W believes the public would benefit from reallocation of the spectrum in question. Several of our clients, and the CII as a whole, would benefit from the following positives, as the NPRM:

- Creates a new opportunity for wireless ventures in an effort to develop private, secure and reliable broadband networks for next-generation applications
- Encourages technology development that can help small and intermediate companies gain access to higher capacity broadband communications technologies in support of operations and maintenance activities
- Protects air-to-ground and fixed microwave services below and Narrowband Personal Communications services above the 896 to 940 band from harmful interference caused by broadband operations

L&W agrees that the creation of the rebanded spectrum, with broadband operators surrounded by narrowband operators, also contains some challenges identified within the Commission's proposal, including:

- Potentially forcing existing users off of narrowband systems that have many years of useful life – this is especially true for CII radio system operators that traditionally operate in this band and make long-term investments of wide-area radio systems.
- Creating a small shared spectrum space for narrowband users that could limit their opportunities to update and expand radio systems as business needs change
- Placing the narrowband operators on both sides of the broadband operators is likely to have an impact on narrowband systems without proper planning – CII utilizes the narrowband radio systems to coordinate the activities of field personnel in life-threatening activities including energizing and de-energizing high-voltage transmission lines

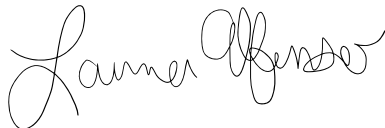
As the FCC considers both the benefits and concerns when taking the next steps regarding the NPRM, L&W believes specific field assessment of the impacts to both the potential broadband operators and narrowband operators in a limited deployment is a prudent consideration prior to full implementation. Such assessment would allow for the greatest possible mitigation of issues, as they are actually, rather than theoretically implemented. The following is a proposed assessment protocol:

- Select a test deployment area where both a broadband operator and a wide-area narrowband operator share a geographical area and perform system tests and obtain metrics regarding the issues and the impacts on each system
- Have each broadband operator create a remediation fund to be used by the narrowband CII operators to mitigate system impacts
- If the broadband systems cause the narrowband systems to experience significant communications failures, the FCC should consider alternative spectrum in a different band for CII narrowband systems
- Institute creative technology or band allocation solutions to mitigate interference between the broadband and narrowband systems

#### **Conclusion:**

L&W supports the Commission's efforts to expand availability of broadband spectrum for CII communications, with the agreement that the relocation and resultant protection of incumbent narrowband users within both the 1.5MHz and .5Mhz is of the utmost importance. L&W believes that establishing a testing procedure to mitigate the concerns expressed by the CII members, should appease all parties and allow for a path forward on private broadband systems at 900MHz.

Respectfully,



Lauren Alfonso  
Chief Executive Officer  
Lockard & White, Inc.