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Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: *Ex Parte* Notice: *Promoting Investment in the 3550-3700 MHz Band –*
GN Docket No. 17-258

Dear Ms. Dortch:

On June 5, 2018, Michael Fitzpatrick, Head of Regulatory Advocacy at the General Electric Company (“GE”) and I spoke by telephone with Erin McGrath, Legal Advisor to Commissioner Michael O’Rielly, to discuss the Commission’s pending Notice of Proposed Rulemaking in the above-captioned proceeding regarding the Citizens Broadband Radio Service (“CBRS”) band.¹ During this call, we addressed issues related to the development of a compromise framework for the assignment of Priority Access Licenses (“PALs”) in the 3.5 GHz CBRS band, including the broad-based, cross-industry coalition compromise proposal filed with the Commission on May 29, 2018.²

As we explained on our call and have described in previous *ex parte* filings,³ if the Commission retains meaningful census-tract licensing at 3.5 GHz, GE expects to bid on census-tract PALs itself and become a CBRS licensee in numerous instances. GE further anticipates

¹ See *Promoting Investment in the 3550-3700 MHz Band*, Notice of Proposed Rulemaking and Order Terminating Petitions, 32 FCC Rcd 8071 (2017) (“*NPRM*”).

² Letter from Frontier Communications, General Electric Company, Google LLC, Motorola Solutions, Inc., NCTA – The Internet & Television Association, NTCA – The Rural Broadband Association, Ruckus Networks, the Rural Wireless Association, Inc., and Wireless Internet Service Providers Association to Marlene H. Dortch, FCC Secretary, GN Docket No. 17-258 (May 29, 2018).

³ See, e.g., Letter from Stephen J. Berman, Counsel to General Electric Company, to Marlene H. Dortch, FCC Secretary, GN Docket No. 17-258 (March 7, 2018); Letter from Stephen J. Berman, Counsel to General Electric Company, to Marlene H. Dortch, FCC Secretary, GN Docket No. 17-258 (Feb. 16, 2018).

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that its industrial and critical-infrastructure customers will bid on an even greater number of census-tract CBRS PALs around the country – to build out private LTE networks with GE to support Industrial Internet of Things (“IIoT”) applications. This will equate to several thousand census-tract license areas where industrial and critical-infrastructure-based operations will occur that require interference-protected, high-bandwidth, low-latency wireless data connectivity. There is no doubt that entities from the industrial and critical-infrastructure sectors will compete vigorously in auctions for census-tract licenses in order to obtain the spectrum necessary to support IIoT-related services and applications.

Whether it is GE or its customers that hold census-tract PALs, GE has a huge economic stake in the use of the CBRS band as a springboard for the IIoT. GE will partner with its industrial and critical-infrastructure customers as it seamlessly and cost-effectively offers these IIoT customers “connectivity in a box” in the 3.5 GHz band. GE will provide these industrial and critical-infrastructure entities with IIoT technology and serve as a wireless system aggregator, using PAL spectrum to take full advantage of advances in inspection, remote control, and monitoring technologies, edge computing capabilities, and cloud-based Big Data predictive analytics (as described at length in GE’s comments). With self-provisioned private LTE networks at 3.5 GHz, GE and its customers will be able to minimize costs, control service quality, enhance safety, and optimize network and IIoT-system performance.

By adopting a framework for PAL licensing that includes census tract PALs, the Commission can maximize the social and economic benefits of the CBRS band, catalyze U.S. 5G leadership and wireless development, and advance the modernization of U.S. infrastructure. Following such an order, GE and its industrial and critical-infrastructure customers will intensively utilize the CBRS band to bring the full benefits of the IIoT revolution to the American public and the U.S. industrial and manufacturing sectors.

Pursuant to section 1.1206(b)(2) of the Commission’s rules, 47 C.F.R. § 1.1206(b)(2), this *ex parte* notification is being filed electronically for inclusion in the public record of the above-referenced proceeding.

Respectfully submitted,

/s/ Stephen J. Berman

Stephen J. Berman

cc: Erin McGrath