



P.O. Box 2608
Corpus Christi, Texas 78403-2608

June 12, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: WT Docket No. 17-200
***Ex Parte* Letter**

Dear Ms. Dortch,

Flint Hills Resources ("FHR"), a wholly owned subsidiary of Koch Industries, Inc., operates 900 MHz narrowband systems at two refineries and a related terminal in Corpus Christi, Texas. The systems are used to manage the day-to-day operations, safety incidents, and emergency communications at these facilities. Private wireless systems that are under our direct control are essential to maintaining a safe and efficient workplace in these complex, noisy environments.

While FHR intends to maintain narrowband operations at these locations, and is planning the deployment of new digital systems, it also is aware of the capabilities of broadband technology, particularly for data applications. Employees at these facilities are able to use commercial wireless systems in certain areas and for certain operations. However, commercial coverage is not available throughout the refineries and third party networks are not appropriate for transmitting highly sensitive information. Concerns about cybersecurity are increasing in all industries, but particularly for companies like FHR that are engaged in activities classified as critical infrastructure.

For this reason, FHR supports the FCC's proposal to create a 900 MHz broadband service that will target the communications needs of industrial operations like ours. Having the opportunity to deploy a private broadband network in this band, one that is not tied to the Internet, would be a welcome addition to the menu of wireless options the company will be evaluating when assessing its future requirements. As long as the FCC ensures that the relocation process needed to clear the broadband segment guarantees comparable facilities for incumbents with costs paid by the broadband licensee, FHR endorses the FCC's proposals in this proceeding and encourages it to adopt final rules promptly.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'Brook A. Vickery', written over a horizontal line.

Brook A. Vickery, P.E.

Vice-President and Manufacturing Manager