



Wireless
Infrastructure
Association

July 3, 2019

VIA ELECTRONIC FILING

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

**Re: Notice of *Ex Parte* Communication
Review of 896-901/935-940 MHz Band Rules, WT Docket No.
17-200**

Dear Ms. Dortch:

The Wireless Infrastructure Association (“WIA”)¹, pursuant to Section 1.1206 of the Federal Communications Commission’s (“Commission”) rules, is pleased to endorse the Commission’s ongoing efforts in this proceeding to promote additional broadband deployment that will advance the goals of its 5G FAST Plan.² Across numerous Commission proceedings, WIA works to support the widespread deployment of wireless infrastructure in order to enable wireless broadband everywhere. The core of WIA’s membership provides the

¹ The Wireless Infrastructure Association (WIA) is the principal organization representing companies that build, design, own, and manage wireless telecommunications facilities throughout the world. WIA’s members include carriers, infrastructure providers, and professional services firms.

² See *The FCC’s 5G FAST Plan*, FED. COMM’NS COMM’N, <https://www.fcc.gov/5G> (last visited July 3, 2019) (“Under Chairman Pai, the FCC is pursuing a comprehensive strategy to Facilitate America’s Superiority in 5G Technology (the 5G FAST Plan). The Chairman’s strategy includes three key components: (1) pushing more spectrum into the marketplace; (2) updating infrastructure policy; and (3) modernizing outdated regulations.”).

backbone of our country's telecommunications capabilities – the infrastructure that carries and delivers broadband to and from consumers, businesses, and more.

When the Commission has an opportunity to stimulate additional broadband investment and innovation, it has recognized in the 5G FAST Plan the need to move forward quickly. It has that opportunity in this proceeding. As the record reflects, realignment of the 900 MHz band will facilitate the intersection of wireless broadband and the utility and critical infrastructure sector. New investment, new infrastructure, new jobs, and increased innovation will flow from a quick decision. The new investment in infrastructure it stimulates will have the effect of supporting the business case for further investment in wireless infrastructure that can also support 5G services.

The Commission has made extraordinary progress in identifying underutilized spectrum that can support more advanced technologies, including mid-band and high-band spectrum. It is not often that low-band spectrum becomes available. Low-band spectrum is particularly well suited for utilities, critical infrastructure, and business enterprise users, which require wide-area coverage for a limited number of users. Therefore, this band of spectrum can facilitate a commercial solution for a pressing need that serves the public interest. Realignment of the 896-901/935-940 MHz band to create a new, low-band broadband option for utilities, critical infrastructure, and business enterprise users would represent another successful milestone in the Commission's long and successful path toward putting underutilized spectrum to its highest and best use.

In comments to this *NPRM*,³ Southern California Edison perhaps identifies the need and the opportunity most accurately:

The electrical utility industry in this country is now at a historic threshold. The telecommunications methods, equipment, and networks of the 20th century are no

³ Review of the Commission's Rules Governing the 896-901/935-940 MHz Band, WT Docket No. 17-200, *Notice of Proposed Rulemaking*, (Mar. 14, 2019).

longer up to the task of meeting 21st century climate conditions and security threats, not to mention the increasing complexity of administering the interconnected grids that make up the nation's electrical infrastructure. SCE views the current proceeding as holding nothing less than the potential to have a defining, once-in-a-generation impact on the ability of utilities to continue to deliver safe and reliable power to their customers for decades to come.⁴

The record in this proceeding already confirms significant and growing support for the Commission's proposal.⁵ The *NPRM* identifies use cases and a need for spectrum in the critical infrastructure and utility sectors.⁶ As the Commission stated, high-speed broadband is an essential ingredient in fueling robust business growth.⁷ This certainly is true for enterprises such as electric utilities that have a need for private broadband facilities in order to protect and manage their evolving utility networks. Adoption of rules authorizing a 900 MHz broadband service not only would help address those requirements but would also be another catalyst for American job creation as networks are designed and built to support those operations.

Since 1949, WIA has worked to increase wireless connectivity across the nation. WIA members promote this goal through investment in modern infrastructure ensuring that the United States continues to lead the world in wireless broadband deployment and remains on the forefront of wireless solutions. With this *NPRM*, the Commission has an opportunity to facilitate rapid repurposing of this band, preventing holdouts from delaying investment and job creation, while addressing the goals of the 5G FAST Plan. The extensive record in this proceeding warrants prompt and favorable action by the Commission.

⁴ Comments of Southern California Edison at 3, WT Docket No. 17-200 (June 3, 2019).

⁵ *NPRM* at ¶ 5.

⁶ *Id.* at ¶¶ 7-8.

⁷ *Id.* at ¶ 7.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed in ECFS. Please do not hesitate to contact the undersigned with any questions.

July 3, 2019

Respectfully submitted,

/s/ John A. Howes, Jr.

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