

July 10, 2019

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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

***Amendment of the Commission's Rules with Regard to Commercial Operations in the
3550-3650 MHz Band
GN Docket No. 12-354***

Ex Parte Communication

Dear Ms. Dortch:

Edison Electric Institute, Enterprise Wireless Alliance, FedEx Corporation, General Electric Company, pdvWireless, Inc. d/b/a Anterix, Southern Company Services, Inc. d/b/a Southern Linc, Union Pacific Railroad Company, and Utilities Technology Council (all members of the broader "IIoT Coalition") would like to express our general support for the positions set forth by the Wireless Internet Service Providers Association ("WISPA"), Altice USA, American Petroleum Institute, Frontier Communications, Motorola Solutions, NCTA, and Windstream in their written *ex parte* dated June 4, 2019, and share the concerns expressed therein.

The IIoT Coalition is composed of companies and organizations involved in industrial and critical infrastructure; and that are pursuing digital solutions that require access to spectrum. The members of the IIoT Coalition collectively account for approximately 40% of the U.S. economy and are involved in power, oil and gas production, transportation, shipping, railways, maritime operations, agriculture, aviation, and manufacturing. The increases in economic and operational efficiency, safety, and reliability that are enabled by advanced wireless connectivity are similarly driving innovation, investment, and deployment of dedicated advanced wireless networks, 5G network equipment, and technologies in other sectors.

Our principal concerns with AT&T's proposal for a new Category C antenna for the CBRS band are as follows: (1) AT&T's proposal is offered extremely late in the process; (2) the proposed higher power risks creating in-band interference, especially to the extent that networks will be TDD systems; (3) the proposed higher power levels will increase the size of DPAs and add complexity to the SAS/ESC/DPA system; (4) for critical infrastructure users, the already proposed Category A and Category B antenna will be sufficient. AT&T's proposal could undermine use cases, harm investment, and limit innovation even beyond the impacts already implicated by moving PALs from census tract to county size.

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Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed in ECFS in the above-referenced dockets. Please do not hesitate to contact the undersigned with any questions.

Respectfully submitted,

Edison Electric Institute
Enterprise Wireless Alliance
FedEx Corporation
General Electric Company
pdvWireless, Inc. d/b/a Anterix
Southern Company Services, Inc.
d/b/a Southern Linc
Union Pacific Railroad Company
Utilities Technology Council