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July 22, 2019

VIA ELECTRONIC FILING

Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

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

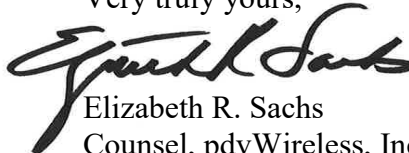
Dear Ms. Dortch:

On July 18, 2019, Chris Guttman-McCabe of CGM Advisors, consultant to pdvWireless, Inc. d/b/a Anterix (“Anterix”), Robert Burkhardt from Anterix, Jay Jacobsmeyer of Pericle Communications Company (participating by telephone) and Arif Ansari, both consultants to Anterix, and undersigned counsel for Anterix, met with the Office of Engineering & Technology (“OET”) personnel listed below. The parties discussed the technical rules included in the Notice of Proposed Rulemaking in the above-identified proceeding, which are generally consistent with the rules recommended jointly by pdvWireless, Inc. and the Enterprise Wireless Alliance in May 2015 in RM-11738, the precursor to the instant proceeding. The Anterix representatives expressed their support for the rules proposed by the FCC and volunteered to address technical questions, should any arise in the future. They endorsed the placement of the proposed broadband segment, which the FCC shifted down from the upper end of the 900 MHz band, and reaffirmed Anterix’s understanding that broadband licensees will be responsible for ensuring that all relocated incumbents receive comparable facilities with the reasonable costs paid by the broadband licensee. They also expressed support for the FCC proposal to exempt incumbents with “complex” systems, those with 65 or more integrated sites, from any mandatory relocation provision, an approach that would address the concerns expressed by certain incumbents with particularly large systems. The Anterix representatives also noted the unique licensing position of the Association of American Railroads (“AAR”), which holds an effectively nationwide 900 MHz authorization, and AAR’s desire for sufficient contiguous 900 MHz spectrum to support future wideband operations.

This letter is being filed electronically, in accordance with Section 1.1206(b) of the Commission’s Rules, 47 C.F.R. § 1.1206(b), for inclusion in the record in these proceedings.

Kindly refer any questions or correspondence regarding this matter to the undersigned.

Very truly yours,



Elizabeth R. Sachs
Counsel, pdvWireless, Inc. d/b/a Anterix

cc (via email):
Julie Knapp
Ron Repasi
Michael Ha
Martin Doczkat