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September 10, 2019

**VIA ELECTRONIC FILING**

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

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

Dear Ms. Dortch:

On September 5, 2019, Chris Guttman-McCabe of CGM Advisors, and Jot Carpenter of Carpenter Strategic Consulting, LLC, both consultants to Anterix, Inc. (previously pdvWireless, Inc.), met with Aaron Goldberger, Wireless and International Advisor to Chairman Ajit Pai. The parties had a detailed discussion of issues raised in the Notice of Proposed Rulemaking ("NPRM") in the above-identified proceeding, and highlighted that the inclusion of the band in the Commission's FAST Plan clearly recognized the value of bringing this band to broadband, now visible through a significant number (and soon to grow) of experimental licenses as well as numerous comments in the record in support of 900 MHz broadband. They also discussed the urgent need for a timely decision by the Commission as there are utility and other critical infrastructure entities ready to build and deploy systems now.

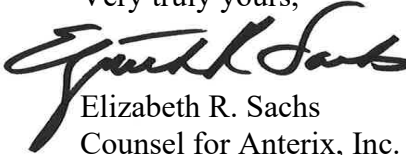
The Anterix representatives expressed the company's strong support for the broadband transition approach proposed in the NPRM, as well as the licensing, operating, and technical rules. They reaffirmed the position endorsed by Anterix throughout this proceeding and its predecessor, RM-11738, that a 900 MHz band realignment must be premised on a band clearing process that ensures all incumbents receive comparable facilities and have their reasonable retuning costs paid by the broadband licensee. The technical rules must -- and Anterix submits the proposed rules are designed to -- protect incumbents from harmful interference, allowing narrowband and broadband systems to co-exist in the 900 MHz band. (Anterix recommends adoption of rules that define Interference Protection Rights for incumbents such as those proposed in the Anterix/EWA May 3, 2015 *ex parte* filing in RM-11738.)

The parties also had an in-depth discussion of the voluntary versus mandatory realignment issue. The Anterix representatives reiterated the company's position that this process should start, and in many counties likely will conclude, with entirely voluntary agreements. Anterix has already negotiated agreements with a number of incumbents, including several large utilities whose 900 MHz systems have been redeployed on channels in the 2/2 MHz reserved for narrowband use. However, the NPRM also recognizes that an entirely voluntary process inevitably creates

opportunities for hold-outs. In Anterix's opinion, this is not a concern about the great majority of 900 MHz incumbents. That is why Anterix agrees, as recommended in the NPRM, that "complex systems" should remain exempt from any mandatory retuning provision. It also endorses the NPRM proposal that mandatory relocation could not be triggered for any incumbent until the prospective broadband licensee has reached agreement with a significant percentage of incumbents in the county. The NPRM proposed that agreements must be reached with entities controlling 90% of the channels within the 900 MHz Broadband Service by the end of year one of voluntary negotiation and 80% by the end of year two. This very high bar effectively guarantees voluntary agreements with all parties that have expressed concern to the FCC about mandatory relocation. What it prevents is the very real possibility that an incumbent with a *de minimis* spectrum position, one that could be replaced easily with comparable facilities, will prevent utilities and other critical infrastructure entities that have expressed an increasingly urgent need for a private wireless broadband option below 1 GHz from meeting their communications needs.

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 for Anterix, Inc.

cc (via email):  
Aaron Goldberger