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September 17, 2018

Mr. Donald Stockdale, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**RE: WT Docket No. 17-200
Request for Clarification
Public Notice, DA 18-949
900 MHz Temporary Filing Freeze**

Dear Mr. Stockdale:

The Enterprise Wireless Alliance (“EWA” or “Alliance”), in collaboration with pdvWireless, Inc., is the proponent of the proposal to realign the 900 MHz band under consideration in the above-identified proceeding.¹ As such, the Alliance understands why a freeze² is necessary to preserve the current 900 MHz landscape and deter the filing of speculative applications, although it urges the Commission to finalize the proceeding as promptly as possible, so that the freeze is not in place for longer than absolutely necessary.

EWA does request a clarification of one aspect of the freeze. The second category of prohibited filings is “applications that seek to modify existing licenses by adding or changing frequencies or locations.”³ The third category is “applications that seek to modify existing licenses by changing technical parameters in a matter that expands the station’s spectral or geographic footprint, such as, but not limited to, increases in bandwidth, power level, antenna height, or area of operation.”⁴ EWA believes, but asks the Bureau to clarify, that licenses can be modified to change location, as long as the modified location does not expand the currently

¹ Review of the Commission’s Rules Governing the 896-901/935-940 MHz Band, WT Docket No. 17-200, *Notice of Inquiry*, 32 FCC Rcd 6421(2017).

² Wireless Telecommunications Bureau Announces Temporary Filing Freeze on the Acceptance of Certain Part 90 Applications for 896-901/935-940 MHz (900 MHz Band) Spectrum, *Public Notice*, WT Docket No. 17-200, DA 18-949 (rel. Sept. 13, 2018).

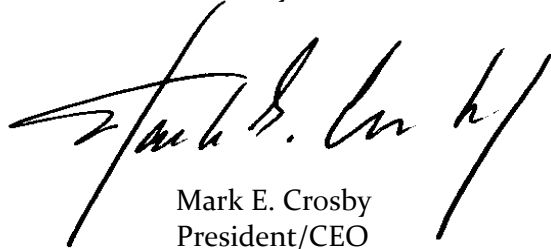
³ *Id.* at 2.

⁴ *Id.*

licensed 40 dBu service contour. That interpretation would be consistent with the Bureau's position in other Part 90 freezes.⁵

EWA looks forward to the clarification of this issue and to working with the Commission in addressing the matters under consideration in this proceeding.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark E. Crosby". The signature is stylized with a large, sweeping initial "M" and a long, horizontal stroke extending to the right.

Mark E. Crosby
President/CEO

cc: Stana Kimball
Roger Noel
Scot Stone

⁵ Wireless Telecommunications Bureau and Public Safety and Homeland Security Bureau Clarify Suspension of the Acceptance and Processing of Certain Part 22 and 90 Applications for 470-512 MHz (T-Band) Spectrum, *Public Notice*, 27 FCC Rcd 6087 at 1-2 (WTB/PSHSB 2012).