

September 12, 2017

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Room TW-B204
Washington, D. C. 20554

RE: Ex Parte Letter
RM 17-200
900 MHz Notice of Inquiry

General Dynamics Mission Systems ("GDMS") wishes to respond to the above-identified Notice of Inquiry (NOI).

GDMS has followed this proceeding carefully because of the escalating interest in dedicated private wireless broadband communications that are not always available on commercial systems.

In our view, as the prevalence of broadband communications grows, an enterprise broadband allocation becomes more worthy of discussion as a means to provide dedicated communications. The subject NOI recently released in this proceeding provides a useful starting point for a Notice of Proposed Rulemaking in which GDMS and other interested parties can address in greater detail the technical, operational, and legal issues that will require resolution. GDMS itself is a licensee/user of radio spectrum in the subject band, for purposes of industrial security communications. As such, we appreciate firsthand the need for communications with very stringent requirements for reliability, redundancy, and coverage that exceed typical commercial standards. Priority access during critical situations has particular significance.

With respect to the Commission's paragraph 17 request for comment on the public interest aspects of changes to the existing 900 MHz regime, we observe that allocation of 3 x 3 MHz for broadband at a national level would have two potential benefits. Both benefits assume some existing B/ILT operators will migrate onto a new shared broadband service enabled by the proposed rebanding. First, consolidation of multiple low-utilization B/ILT operations into the shared band would increase spectrum efficiency and potentially free some existing narrowband channels. Second, for regional or nationwide B/ILT licensees that currently maintain enterprise operations in multiple narrowband channels, consolidation onto the shared band would reduce or altogether eliminate existing operations and maintenance costs for multiple narrowband equipment sets.

Additionally, as an original equipment manufacturer of LTE equipment and as an LTE network provider, GDMS views a future re-banding as stimulative to its own business interests in that new 900MHz systems constitute a new market for GDMS products and services.

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GDMS appreciates that any band realignment will involve some disruption to some band incumbents. It is a fundamental principle that all incumbents (including GDMS) receive equal or more capable facilities and have the reasonable associated costs paid by future Private Enterprise Broadband (PEBB) licensees within this 900 MHz band. With that caveat, GDMS urges the FCC to proceed to a Notice of Proposed Rulemaking in which the benefits and challenges of this proposal can be examined in detail. Your consideration in this matter is appreciated.

Should any questions arise concerning the foregoing comments, or should additional information be required, please contact Mr. John Burleson, Director, FirstNet and Federal Systems, for GDMS at (480) 441-4109 or by email, john.burleson@gd-ms.com.

Respectfully,
General Dynamics Mission Systems

A handwritten signature in black ink, appearing to read 'William Weiss', with a stylized, cursive script.

William Weiss
Vice President & General Manager
Ground Systems