

Elizabeth R. Sachs  
8300 Greensboro Dr.  
Suite 1200  
Tysons, VA 22102

NOT ADMITTED IN VA  
lsachs@fcclaw.com  
(703) 584-8663  
WWW.FCCLAW.COM

LLGS | LUKAS  
LAFURIA  
GUTIERREZ  
& SACHS LLP

September 18, 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**

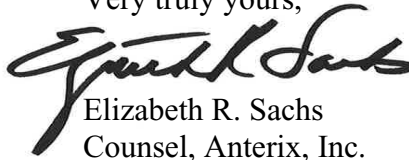
Dear Ms. Dortch:

The attached email dated September 16, 2019 was sent on that day by Chris Guttman-McCabe of CGM Advisors, consultant to Anterix, Inc., to the Wireless Telecommunications Bureau ("WTB") personnel listed below. An email substantively identical to the attached email dated September 17, 2019 was sent on that date to the Commissioner Advisors listed below. A press release regarding the NREL project referenced in those emails is attached.

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, Anterix, Inc.

Attachments

cc (via email):

WTB:

Joel Taubenblatt

Roger Noel

Lloyd Coward

Scot Stone

Amanda Huetinck

Commissioner Advisors:

Nicholas Degani, Senior Counsel, Chairman Pai

Aaron Goldberger, Wireless and International Advisor, Chairman Pai

Erin McGrath, Legal Advisor, Wireless, Public Safety and International, Commissioner O'Rielly

Will Adams, Legal Advisor, Commissioner Carr

Umair Javed, Legal Advisor, Wireless and International, Commissioner Rosenworcel

William Davenport, Chief of Staff and Senior Legal Advisor for Wireless and International,  
Commissioner Starks

---

**From:** Christopher Guttman-McCabe <[chris@cgmadvors.com](mailto:chris@cgmadvors.com)>

**Date:** September 16, 2019 at 3:02:34 PM EDT

**To:** Joel Taubenblatt <[Joel.Taubenblatt@fcc.gov](mailto:Joel.Taubenblatt@fcc.gov)>, Roger Noel <[Roger.Noel@fcc.gov](mailto:Roger.Noel@fcc.gov)>, Lloyd Coward <[Lloyd.Coward@fcc.gov](mailto:Lloyd.Coward@fcc.gov)>, Scot Stone <[Scot.Stone@fcc.gov](mailto:Scot.Stone@fcc.gov)>, [Amanda.Huetink@FCC.Gov](mailto:Amanda.Huetink@FCC.Gov)

**Cc:** Liz Sachs <[LSachs@fcclaw.com](mailto:LSachs@fcclaw.com)>

**Subject: 900 MHz -- 24 Utilities and More**

Joel, Roger, Lloyd, Scot and Amanda,

I hope you all are doing well and had a great weekend. Thank you for meeting with Liz and the technology team last week. As a follow up, we wanted to provide a couple quick updates on the incredible activity among utilities and other critical infrastructure providers regarding the 900 MHz band, some of which was discussed. **First, Anterix (formerly PDV), is in discussions with more than 24 utilities, that provide service in 37 states, as well as numerous other critical infrastructure entities. As you know, the Commission has granted three experimental licenses, one which involves seven utilities. A fourth experimental has been filed, a fifth is not far behind, and there are as many as nine others on the way. There are numerous RFI/RFP processes under consideration. UBBA, the Utility Broadband Alliance, has nineteen members. In October, Southern Company will host UBBA's first substantive industry meeting to discuss the path to private enterprise LTE -- 95 people already have registered to attend.** The 900 MHz proceeding is rapidly evolving into an opportunity for the critical infrastructure community, particularly our Nation's electric utilities, to evolve their communication's capabilities to match their needs. The pace continues to pick up. The Commission has an opportunity to make good spectrum policy while supporting the resilience and the cyber security requirements of our Nation's electric grid.

Second, last week the Department of Energy's National Renewable Energy Lab in Colorado introduced the initial results of its High Impact Project, in partnership with Anterix and seven utilities, demonstrating the integration of private enterprise 900 MHz spectrum and how it can support the evolving power grid. "Adding more renewable and advanced energy technologies to the grid requires a backbone of secure, reliable communications," said Juan Torres, NREL's Associate Laboratory Director for Energy Systems Integration. "NREL's work with Anterix at the Energy Systems Integration Facility is answering questions and identifying scalable solutions to allow communications to keep pace with deployment." Moving into phase two, the private LTE network will be expanded to include a full suite of utility grid automation devices and the Advanced Distribution Management System (ADMS) control system. A link to the joint press release is attached.

The key is providing these utilities and the rest of the critical infrastructure community with a near-term private enterprise 900 MHz option. While there remains commercial work, and negotiations, to be completed, the existing activity shows that quick action from the Commission will release an incredible amount of innovation, investment and job creation. As the NPRM proposes, those who have voiced concern can be covered by the "complex

system" exception in the NPRM. Additionally, the success threshold in the NPRM provides both an opportunity to let market forces play out, while simultaneously preventing holdouts from denying the incredible benefits to the country that are poised to be released in a timely manner.

I couldn't be more excited about what I am seeing play out in the utility sector. There is a great opportunity to make good spectrum policy while truly helping to facilitate the evolution of the smart grid. US companies, incredible investment and job creation, LTE-based innovation, good spectrum policy, protection and evolution of our grid, and more.

If you have any questions, please don't hesitate to call me.

Sincerely,

Chris

NREL Press Release: <https://www.anterix.com/press-releases-article/8656/>

--

Christopher Guttman-McCabe

CGM Advisors, LLC

202-309-3637

A Technology Consulting Firm Focusing on **C**ommunications, **G**overnment Relations and **M**arket Analysis

---

**From:** Christopher Guttman-McCabe <[chris@cgmadvisors.com](mailto:chris@cgmadvisors.com)>  
**Date:** September 17, 2019 at 8:02:19 AM EDT  
**To:** "Aaron N. Goldberger" <[aaron.goldberger@fcc.gov](mailto:aaron.goldberger@fcc.gov)>, Jot Carpenter  
<[jot@carpenterstratcon.com](mailto:jot@carpenterstratcon.com)>  
**Subject:** 900 MHz -- 24 Utilities and More

Aaron,

I hope you are doing well and had a great weekend. Jot and I wanted to thank you for meeting with us last week, it was much appreciated. As a follow up, we wanted to provide a couple quick updates on the incredible activity among utilities and other critical infrastructure providers regarding the 900 MHz band. **First, Anterix (formerly PDV), is in discussions with more than 24 utilities, that provide service in 37 states, as well as numerous other critical infrastructure entities. The Commission has granted three experimental licenses, one which involves seven utilities. A fourth experimental has been filed, and there are as many as ten others on the way. There are numerous RFI/RFP processes under consideration. UBBA, the Utility Broadband Alliance, has nineteen members. In October, Southern Company will host UBBA's first substantive industry meeting to discuss the path to private enterprise LTE -- 95 people already have registered to attend.** The 900 MHz proceeding is rapidly evolving into an opportunity for the critical infrastructure community, particularly our Nation's electric utilities, to evolve their communication's capabilities to match their needs. The pace continues to pick up. The Commission has an opportunity to make good spectrum policy while supporting the resilience and the cyber security requirements of our Nation's electric grid.

Second, last week the Department of Energy's National Renewable Energy Lab in Colorado introduced the initial results of its High Impact Project, in partnership with Anterix and seven utilities, demonstrating the integration of private enterprise 900 MHz spectrum and how it can support the evolving power grid. "Adding more renewable and advanced energy technologies to the grid requires a backbone of secure, reliable communications," said Juan Torres, NREL's Associate Laboratory Director for Energy Systems Integration. "NREL's work with Anterix at the Energy Systems Integration Facility is answering questions and identifying scalable solutions to allow communications to keep pace with deployment." Moving into phase two, the private LTE network will be expanded to include a full suite of utility grid automation devices and the Advanced Distribution Management System (ADMS) control system. A link to the joint press release is attached.

The key is providing these utilities and the rest of the critical infrastructure community with a near-term private enterprise 900 MHz option. While there remains commercial work, and negotiations, to be completed, the existing activity shows that quick action from the Commission will release an incredible amount of innovation, investment and job creation. As the NPRM proposes, those who have voiced concern can be covered by the "complex system" exception in the NPRM. Additionally, the success threshold in the NPRM provides

both an opportunity to let market forces play out, while simultaneously preventing holdouts from denying the incredible benefits to the country that are poised to be released in a timely manner.

I couldn't be more excited about what I am seeing play out in the utility sector. There is a great opportunity to make good spectrum policy while truly helping to facilitate the evolution of the smart grid. US companies, incredible investment and job creation, LTE-based innovation, good spectrum policy, protection and evolution of our grid, and more.

If you have any questions, please don't hesitate to call me.

Sincerely,

Chris

NREL Press Release: <https://www.anterix.com/press-releases-article/8656/>

--

Christopher Guttman-McCabe

CGM Advisors, LLC

202-309-3637

A Technology Consulting Firm Focusing on **C**ommunications, **G**overnment Relations and **M**arket Analysis

# Anterix Announces Completion of First Phase of NREL High-Impact Status Project

Results show 900 MHz Private LTE networks enhancing the resilience of next generation distribution systems



---

NEWS PROVIDED BY

**Anterix →**

Sep 12, 2019, 13:42 ET

---

WOODLAND PARK, N.J., Sept. 12, 2019 /PRNewswire/ -- Anterix (NASDAQ: ATEX) announced today the completion of phase one of the company's ongoing project with the U.S. Department of Energy's National Renewable Energy Laboratory (NREL). Leveraging Anterix's 900 MHz spectrum, NREL has successfully demonstrated increased reliability for distributed generation systems such as solar and wind using private Long-Term Evolution (LTE) communications. The results show the potential for private LTE networks to effectively transmit control information without interruption or delay, regardless of usage level or other congestion conditions.

NREL and Anterix have been working with an independent Industrial Advisory Board (IAB), comprised of seven leading utilities that provide service across 18 states, as well as the former Chief Technology Officer of the DOE, Pete Tseronis. The members of the IAB include Consumers Energy, Duke Energy, Evergy, Eversource Energy, Hawaiian Electric, Holy Cross Energy and Xcel Energy. Together, they have worked to analyze the performance of private LTE broadband networks and accelerate the development and validation of innovative approaches to enhance the resilience of distribution systems, including microgrids, with high penetration of distributed energy resources (DERs). The initial results of this innovative project show that Anterix's private 900 MHz broadband spectrum can enable a private LTE network to quickly communicate signals to energy grid devices.

"Anterix is proud to support the NREL project to help define resilient and secure communications for our nation's critical infrastructure. These initial results give a baseline for controlling intermittent energy sources that utilities can refer to as they plan for a future filled with solar generation. Technology moves fast; the utility industry is moving with it and Anterix is committed to supporting these transformative changes leveraging private 900 MHz broadband spectrum," said Mike Brozek, Senior Vice President of Technology for Anterix.

"Adding more renewable and advanced energy technologies to the grid requires a backbone of secure, reliable communications," said Juan Torres, NREL's Associate Laboratory Director for Energy Systems Integration. "NREL's work with Anterix at the Energy Systems Integration Facility is answering questions and identifying scalable solutions to allow communications to keep pace with deployment."

Moving into phase two, the private LTE network will be expanded to include a full suite of utility grid automation devices and the Advanced Distribution Management System (ADMS) control system. Similar wireless congestion scenarios will be tested with high impact communications, such as control signals, prioritized over normal traffic such as meter reads. The IAB will guide these efforts to ensure the testing scenarios reflect real world utility conditions.

## **About Anterix**

Anterix (NASDAQ: ATEX) is focused on empowering the modernization of critical infrastructure and enterprise business communications by enabling broadband connectivity. Our foundational spectrum provides the ability to transform our customers operations to meet new business complexities while achieving higher levels of performance and safety. Anterix is the largest holder of licensed spectrum in the 900 MHz band, with nationwide coverage throughout the contiguous United States, Hawaii, Alaska and Puerto Rico. Anterix is currently pursuing a regulatory proceeding at the Federal Communications Commission that seeks to modernize and realign the 900 MHz band by allowing it to be utilized for the deployment of broadband networks, technologies and solutions. Our chairman and our CEO co-founded Nextel Communications and have over 60 years of combined experience in telecom operations and innovative spectrum initiatives.

## **Forward-looking Statements**

Any statements contained in this press release that do not describe historical facts are forward-looking statements as defined under the Federal securities laws. These forward-looking statements may include, but are not limited to, statements regarding: (i) projected capabilities of private LTE networks, (ii) the expected timing of the FCC's issuance of a final Report and Order; (iii) the Company's ability to satisfy the FCC's future requirements to qualify for broadband licenses; and (iv) the demand by, and the Company's potential contractual terms with, other electric utilities and critical infrastructure providers for the lease of its spectrum assets. Any such forward-looking statements are based on the Company's current expectations and are subject to a number of risks and uncertainties that could cause its actual future results to differ materially from its current expectations or those implied by the forward-looking statements. These risks and uncertainties include, but are not limited to: (i) the FCC may not issue a final Report and Order on a timely basis, or at all; (ii) the terms of any final Report and Order may not be favorable or may significantly delay or increase the costs required to commercialize the Company's spectrum assets compared to the timing and costs assumed in its business plan; (iii) even if its FCC initiatives are successful, the Company may not be successful in commercializing its spectrum assets to its targeted customers and markets; (iv) the Company's initiatives with the federal and state agencies and commissions that regulate electric utilities may not be successful; (v) the Company has no operating history with its proposed business plan, which makes it difficult to evaluate its prospects and future financial results, and its business activities, strategic approaches and plans may not be successful; (vi) the Company may not be able to correctly estimate its operating expenses or future revenues; (vii) many of the third parties who have objected to the Company's FCC initiatives, or with whom it competes against, have more resources, and greater political and regulatory influence; and (viii) spectrum is a limited resource, and the Company may not be able to obtain sufficient contiguous spectrum to support its spectrum initiatives or its planned business operations and future growth. These and other factors that may affect the Company's future results of operations are identified and described in more detail in its filings with the Securities and Exchange Commission (the "SEC"), including the Company's Quarterly Report on Form 10-Q for the fiscal quarter ended June 30, 2019, filed with the SEC on August 8, 2019. You should not place undue reliance on these forward-looking statements, which speak only as of the date of this press release. Except as required by applicable law, the Company does not intend to update any of the forward-looking statements to conform these statements to actual results, later events or circumstances or to reflect the occurrence of unanticipated events.



## **Contacts**

Natasha Vecchiarelli

Director of Investor Relations & Corporate Communications

Anterix

973-531-4397

nvecchiarelli@anterix.com

Andrew Grafton

(202)-379-0826

agrafton@rhstrategic.com

SOURCE Anterix