

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

November 15, 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 November 13, 2019, John Hughes and Cole Crews from Ameren, Jeffrey Marks from Nokia, Matt Olson from Burns and McDonnell, Alice Moy-Gonzalez from Anterix, Christopher Guttman-McCabe of CGM Advisors on behalf of Anterix, Mat Eshpeter and Allen Tharp from Xcel Energy (both of whom joined each of the meetings by telephone), and Jot Carpenter of Carpenter Strategic Consulting on behalf of Anterix (who joined the Commissioner O’Rielly meeting) had separate meetings with Commissioner Michael O’Rielly and his Wireless, Public Safety and International Legal Advisor Erin McGrath, Commissioner Brendan Carr and his Wireless Legal Advisor Will Adams, and Aaron Goldberger, Wireless and International Advisor to Chairman Pai.

The attendees represent a cross-section of the utility sector, from providers of services across 10 states, to two of the leading vendors to the wireless, utility and critical infrastructure sectors. In the meetings, Ameren highlighted its immediate need for the 900 MHz proceeding to be completed to support the enhanced resiliency of the electric grid. They detailed the successful results of the 14 use-cases they tested in their FCC-granted Experimental License in the 900 MHz band. They also highlighted that they have a developed business case for deploying 900 MHz broadband across their utility footprint, and simply are waiting on the completion of the proceeding to begin investment. According to Ameren, the 900 MHz broadband deployment will drive a significant number of new jobs both during the construction of the new private LTE network and after.

Xcel also highlighted the benefits of the Commission moving forward with the proceeding, stating in the meetings that the company has concluded that a low-band private LTE solution is necessary for the company going forward. Xcel confirmed that it is in the process of developing an application for an additional 900 MHz broadband experimental license to be filed with the Commission. The parties also shared detail on the Phase 1 of the Department of Energy's National Renewable Energy Laboratory project that, in coordination with seven utilities, is using the Anterix experimental license granted by the FCC to evaluate private LTE capabilities for the control of distributed energy resources, including circuits that control power lines.

Nokia's focus at the meetings was on the near-term broadband needs of the utility sector, specifically highlighting the substantial interest, excitement and scale they are seeing in the private LTE environment. Nokia is working with several of the utilities that currently have experimental licenses investigating numerous use-cases for private LTE.

Burns and McDonnell described its engineering and design work across the utility ecosystem, including with Ameren and Xcel, on the development of private LTE networks. Mr. Olson described numerous use cases that the FCC could see once the Order was adopted, including highlighting the Falling Line Conductor capability, which would use 900 MHz private LTE broadband to broadly enable the capability to de-energize a power line that has broken, before it can hit the ground and cause a fire. This capability will be critical for utilities in California that currently are highly interested in low band private LTE to deploy this technology to prevent fires. Mr. Olson also stated that they have completed studies of the need for low-band private LTE networks for more than 10 utilities. He echoed Nokia's conclusion that there is tremendous scale interest in private LTE across the utility and critical infrastructure sectors.

Ms. Moy-Gonzalez discussed the continued growth of the Utility Broadband Alliance ("UBBA"), which attracted 150 attendees to its first annual summit hosted by Southern Company at its Alabama Power facility in Birmingham, Alabama. At the summit, attendees were able to see Southern Line's private LTE network in operation and solving critical needs. She highlighted that Anterix is in commercial discussions with numerous utilities, has worked with the critical infrastructure and large enterprise sector on the five experimental licenses that have been granted, and is in discussions regarding multiple other experimental licenses.

In each of the meetings, the parties urged the FCC to adopt final rules in the proceeding as quickly as possible in response to the urgent needs of these industries, highlighting that investment will flow immediately upon adoption of the Order.

Marlene H. Dortch, Secretary

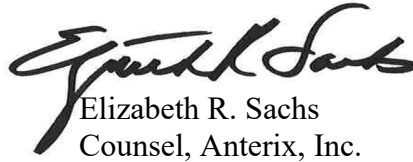
November 15, 2019

Page 3

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 this proceeding.

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

Very truly yours,

A handwritten signature in black ink, appearing to read "Elizabeth R. Sachs".

Elizabeth R. Sachs  
Counsel, Anterix, Inc.

cc (via e-mail):

Commissioner Michael O'Rielly

Commissioner Brendan Carr

Aaron Goldberger

Erin McGrath

Will Adams