November 27, 2017

Federal Communications Commission

445 Twelfth Street, S.W.

Washington, D. C. 20554

Dear Sir or Madam:

**In re: RM 17-200**

Martin Marietta (the “Company”) is writing in response to the Wireless Telecommunications Bureau’s request for comment in the Matter of Review of the Commission’s Rules Governing the 896-901/935-940 MHz Band released on August 4, 2017.

Martin Marietta is a publicly traded company that was formed in 1993 to serve as successor to the operations of the materials group of the organization that is now Lockheed Martin Corporation. The Company is a leading supplier of aggregates and construction materials for the construction industry in the United States. In 2016, the Company’s Building Materials business shipped and delivered aggregates, asphalt products and ready mixed concrete from a network of nearly 300 quarries, underground mines, and distribution facilities, and approximately 150 ready mixed concrete plants, to customers in 29 states, Canada, and the Bahamas.

The Company has followed this proceeding because of our interest in dedicated private wireless broadband communications that are not always available on commercial systems. Our communications needs typically have requirements for reliability, redundancy, and coverage that exceed typical commercial standards due to the remoteness of some of our locations and the lack of radio coverage across markets where we deliver our products. In some cases we operate our own networks in quarries and at various sites across the country, and network coverage for tracking our delivery vehicles and communicating with our drivers is usually supplied through commercial networks that have limited coverage in some market areas. In many cases Priority access during critical situations has particular significance.

An enterprise broadband allocation would be the first choice of many entities to explore a reasonable opportunity for meeting their requirements. The Notice of Inquiry recently released in this proceeding provides a useful starting point for a Notice of Proposed Rulemaking in which interested

parties can address in greater detail the technical, operational, and legal issues that will require resolution.

The Company appreciates that any band realignment will involve some amount of disruption for at least a percentage of band incumbents. It is also important that all incumbents receive fully comparable facilities and have any associated costs paid by the party that is ultimately awarded a broadband license within this 900 MHz band. With those caveats, the Company supports the FCC proceeding to a Notice of Proposed Rulemaking in which the benefits and challenges of the issues put forth in this Notice of Inquiry can be examined in detail.

Sincerely,



H. Abbott Lawrence

Division VP/GM – Ready Mix District