

**SUBMITTED ELECTRONICALLY VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

**Re: WT Docket No. 17-200  
Ex Parte Letter**

Dear Ms. Dortch:

As a consultant whose clients operate private wireless networks for critical infrastructure, our company has a keen interest in ensuring that all bands available to them are optimized for maximum utilization and ready to support technological advances. We assist many of our public utility clients in designing and installing networks that provide high reliability communications for the control of our nation's electric, gas, and water infrastructure.

While broadband LTE technology has become a universally accepted standard in the commercial marketplace, there has been limited opportunity for critical infrastructure entities to enjoy its functionality and economies of scale except as a customer on a commercial network. That option is fine for certain applications, but, as these companies have explained to the FCC, they often have coverage, reliability, security, priority access and other requirements that are not met on today's commercial systems. A private carrier broadband network in a band below 1 GHz where infrastructure costs are manageable would offer these entities a business-targeted option that is sorely needed.

The Part 90 900 MHz band is well-suited for the type of realignment proposed by EWA/PDV. It has been available for more than 30 years but remains significantly underutilized outside of major metro areas. While all spectrum repurposing involves challenges and some degree of disruption, the relatively small number of incumbents will make this process less difficult in this band than in others.

The utility industry should not be left behind as the consumer marketplace migrates to standards based broadband technologies. LTE functionality in a system design tailored to their unique requirements is critical to ensure reliable, resilient, and secure service delivery. The Commission should move as quickly as possible to the next step in this proceeding.

Sincerely,



David Chauncey  
VP & GM Products Group