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April 23, 2015

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Spectrum Networks Group, LLC and M2M Spectrum Networks, LLC, Notice of Ex Parte Presentation, WT Docket No. 14-100

Dear Ms. Dortch:

On April 21, 2015, I spoke with Jonathan Sallet, General Counsel, regarding the waiver request and license applications filed by Spectrum Networks Group, LLC (“SNG”) for licenses in the 896-901/935-940 MHz band (“900 MHz I/B band”). Specifically, we discussed the Wireless Telecommunications Bureau’s (“Bureau”) recent *Order* that denied the waiver request and dismissed the related applications.¹ I stated that the Bureau’s *Order* is rife with error and that SNG plans to submit an appropriate challenge against the *Order*. For one, the *Order* violates the core principle that similarly situated parties must be treated the same unless there is an adequate explanation of the disparate treatment. In the past and during the pendency of this proceeding, the Bureau has frequently granted license applications in the 900 MHz I/B band for similarly situated parties in a prompt manner. The Bureau failed to even discuss this issue in the *Order*.

This summary of the *ex parte* presentation is being submitted pursuant to Section 1.1206(b) of the Commission’s rules.² The letter is being filed electronically through the

¹ Spectrum Networks Group, LLC, Applications and Waiver Request to Allow It to Provide Private, Internal Machine-To-Machine Communications to Businesses on 900 MHz Business/Industrial/Land Transportation Channels, *Order*, WT Docket No. 14-100, DA 15-439, ¶ 1 (rel. Apr. 13, 2015).

² 47 C.F.R. § 1.1206(b).

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Commission's Electronic Comment Filing System, and an electronic copy will also be sent to Mr. Sallet. Please contact the undersigned if you have any questions.

Sincerely,

/s/
Pantelis Michalopoulos
*Counsel to Spectrum Networks Group, LLC
and M2M Spectrum Networks, LLC*

cc: Jonathan Sallet