

Christopher Bjornson
202 429 3059
cbjornson@steptoe.com



1330 Connecticut Avenue, NW
Washington, DC 20036-1795
202 429 3000 main
www.steptoe.com

Filed in ECFS

May 22, 2015

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

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

Dear Ms. Dortch:

On May 20, 2015, Jeff Downs, Senior Vice President for Corporate Development of Spectrum Networks Group, LLC (“SNG”), and Pantelis Michalopoulos, Markham Erickson, and the undersigned from Steptoe & Johnson LLP met with Sean Conway, Mark DeSantis, John Leibovitz, Paul Moon, Scott Patrick, Roger Sherman, and Scot Stone of the Wireless Telecommunications Bureau (“Bureau”) regarding the Application for Review filed by SNG following the Bureau’s denial of SNG’s waiver request and the dismissal of SNG’s applications for licenses in the 896-901/935-940 MHz band (“900 MHz I/B band”).

Specifically, we described numerous instances where the Bureau has granted license applications in the 900 MHz I/B band for applicants that, like SNG and its subsidiary M2M Spectrum Networks, LLC (“M2M”), plan to serve third parties rather than use the spectrum for their own private internal communications needs, including the egregious example of Golden State Communications/5G Properties.¹ We noted the flexibility in the Commission’s rules that allows for the use of the 900 MHz I/B band in the manner that SNG and M2M propose. We provided an update on M2M’s business plan. We also discussed potential alternative means for SNG and M2M to obtain licensed narrowband spectrum in support of its business and its network, either through new applications or rulemaking.

¹ See Spectrum Networks Group, LLC, Application for Review, WT Docket No.14-100, at 9-10 (May 13, 2015).

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 Commission's Electronic Comment Filing System ("ECFS"), and electronic copies will also be sent to the Commission staff with whom we spoke. Please contact the undersigned if you have any questions.

Sincerely,

/s/ _____

Christopher Bjornson

Counsel to Spectrum Networks Group, LLC

cc: Sean Conway
Mark DeSantis
John Leibovitz
Paul Moon
Scott Patrick
Roger Sherman
Scot Stone

² 47 C.F.R. § 1.1206(b).