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Writer's Direct Access

July 8, 2015

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**Via Electronic Filing**

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

Re: PS Docket No. 13-229, and RM-11635  
**Ex Parte Presentation**

Dear Ms. Dortch:

The Telecommunications Subcommittee of the American Petroleum Institute (“API”), by its undersigned counsel, provides this written ex parte pursuant to Section 1.1206 of the Commission’s rules to support the July 7, 2015 letter submitted by the Utilities Telecom Council (“UTC”) in the above-referenced proceeding.

Although API expressed concerns in this proceeding regarding the use of Vehicular Repeater Systems (“VRS”) on 173 MHz band splinter channels, API concurs with UTC’s support for permitting VRS use as long as such operations are conditioned on prior coordination by one of the FCC-certified Part 90 Frequency Advisory Committees and VRS statewide operations are authorized only a secondary basis to other licensees.

API also agrees with UTC’s support for rule changes that would reduce technical restrictions on the 154 MHz and 173 MHz “splinter channels”, including permitting fixed telemetry systems to operate using 12.5 kHz wide bandwidths. This relief is consistent with API’s Comments in this proceeding that relaxation of outdated, unnecessary technical restrictions will promote critical infrastructure’s effective use of the band.<sup>1</sup>

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<sup>1</sup> See API Reply Comments at 8 (Jan. 30, 2015).

KELLER AND HECKMAN LLP

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Pursuant to Section 1.1206(b) of the Commission's Rules, 47 C.F.R. § 1.1206(b), a copy of this letter is being filed electronically for inclusion in the public record of this proceeding. Please contact me if you have any questions.

Sincerely,

/s/

Greg Kunkle

cc: Chairman Wheeler  
Commissioner Clyburn  
Commissioner Rosenworcel  
Commissioner Pai  
Commissioner O'Rielly  
Admiral David G. Simpson  
David Furth