

GENERAL DYNAMICS
Mission Systems

William W. Weiss
Vice President & General Manager

December 9, 2015

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

Re: *Ex Parte* Letter
RM-11738
900 MHz Broadband Proposal

Dear Ms. Dortch:

General Dynamics Mission Systems ("GDMS") wishes to comment on the above-identified proposal to realign the Part 90 900 MHz band and create a new broadband opportunity for business enterprise users. GDMS shares the opinion that the Petition for Rulemaking filed jointly by the Enterprise Wireless Alliance ("EWA") and Pacific DataVision, Inc. ("PDV") proposes a broadband option that deserves serious consideration by the Federal Communications Commission ("FCC").

The FCC has made very significant progress in allocating spectrum for commercial broadband use. GDMS uses carrier-provided broadband service for certain of its applications. However, commercial networks are not always optimal for business enterprise use. Networks designed primarily to address consumer demand do not always provide coverage in areas where businesses operate. They do not necessarily provide the security, hardening, reliability, capacity, service level agreements, or, for certain entities, priority access that are needed to assure continuity of operations for businesses. Users of unlicensed and shared broadband solutions often face similar challenges as well as higher risks of interference with limited regulatory protections. Each of these options may be useful for some purposes but, in many cases, none can fully meet an enterprise's specific business requirements.

The build-to-suit solution proposed in the EWA/PDV Petition seems to GDMS to offer a meaningful option for business entities that are prepared to invest in broadband systems designed to their specifications, but that are not able to acquire exclusive spectrum on which to deploy. Representatives of enterprise users have documented their need for exclusive, dedicated broadband spectrum in

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multiple proceedings, but no such allocation has been proposed by the FCC.¹ Realigning the 900 MHz band to provide for this alternative also would further the FCC's objective of making the most efficient use of limited spectrum resources by facilitating the introduction of more advanced technologies.

Additionally, as an original equipment manufacturer of LTE equipment and as an LTE network provider, GDMS views the EWA/PDV petition as simulative to its own business interests in that new 900MHz systems constitute a new market for GDMS products and services.

America's businesses would be well-served by allowing this proceeding to move forward so a full record can be developed on how best to implement this broadband alternative. GDMS urges the FCC to issue a Notice of Proposed Rulemaking responsive to the Petition as promptly as possible.

Sincerely,

A handwritten signature in black ink, appearing to read 'William W. Weiss', written in a cursive style.

William W. Weiss

Vice President & General Manager

¹ See, e.g., Comments of the Utilities Telecom Council - NBP Public Notice #6, GN Docket No. 09-47, filed Oct. 23, 2009 at 9-11