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June 18, 2013

Via Electronic Mail

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, DC 20554

Re: WTB Docket No. 13-59, Request of PTC-220, LLC for Waivers of Sections 90.729(b) and 90.723(f) of the Commission's Rules, Notice of Ex Parte Meeting

Dear Ms. Dortch:

On behalf of Pepco Holdings, Inc. ("PHI"), this is to confirm that Russell Ehrlich, Charles Peresta, Anne Gwal, and the undersigned met with Roger Noel, Rodney Conway, Brian Butler, and Matt Struble of the Commission's staff on June 17, 2013, expressing PHI's concerns raised by PTC-220's Waiver Request insofar as the proposed waiver would adversely affect PHI's deployed 220-222 MHz network in the Mid-Atlantic region, consistent with PHI's written submission of June 6, 2013.

The primary concern expressed during the meeting is the potential of harmful adjacent channel interference to PHI's wireless 220-222 MHz Smart Grid deployment in the event PTC-220 were to operate its base and fixed stations at the elevated output powers proposed in its Waiver Request, particularly in the densely populated areas of Washington, D.C. and suburban Maryland, New Castle County, Delaware, and Atlantic City, New Jersey, areas in which the preponderance of PHI's electric customers (residential, commercial and industrial) are located.

PHI explained that it acquired 220-222 MHz assignments under an interim lease in late 2011 and subsequent partition arrangement as the primary spectrum to support the Distribution Automation components of the Smart Grid deployments of its three energy delivery companies. The interim spectrum lease enabled PHI to commence construction and operations in early 2012 so that it could meet the company's aggressive network buildout plans. Presently, approximately 60 low power master stations are constructed and operating, and approximately 5,000 remote transmitters, of upwards of potentially tens of thousands of units, are collocated with smart grid

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sensors placed along the electric distribution and transmission networks of the three energy delivery companies, enabling PHI's companies to minimize the duration and geographical extent of outages (by providing enhanced visibility into electric grid operations and enabling the re-routing of power and more timely response to outages).

PHI explained that its 220-222 MHz network master stations were engineered and deployed to operate at very low output powers, consistent with the current rules in Subpart T of Part 90 of the Commission's rules, to maximize channel re-use throughout its service areas. This network has been optimized for secure IP communications, consistent with critical infrastructure cybersecurity requirements. PHI representatives noted that the potential for harmful interference from PTC-220's proposed high power operations is enhanced by the very flat topography that prevails throughout PHI's service areas.

Should questions arise regarding this submission, the Commission is respectfully requested to contact the undersigned.

Sincerely,



C. Douglas Jarrett

cc: Roger Noel
Rodney Conway
Brian Butler
Thomas Struble