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February 18, 2014

VIA ECFS

Marlene H. Dortch, Secretary
FEDERAL COMMUNICATIONS COMMISSION
Office of the Secretary
445 Twelfth Street, SW
Washington, DC 20554

Re: Applications of Cricket License Company, LLC, et al., Leap Wireless International, Inc., and AT&T Inc. for Consent to Transfer Control of Authorizations, WT Docket No. 13-193

Dear Ms. Dortch:

On behalf of Stallion Oilfield Services Ltd., we are writing regarding the proposed transaction between AT&T and Leap in the above-captioned proceeding. Virtual Private Radio Network (“VPRN”) services that utilize Long-term evolution (“LTE”) technologies are vital to the growing needs of Critical Infrastructure Industries (“CIIs”), and we ask the Commission to consider this issue as it reviews the proposed transaction for approval.

CIIs rely on increasingly sophisticated telecommunications networks to support and monitor vital operations and to improve workplace safety. Legacy technology is inadequate to meet the growing capacity and data-transfer speed requirements for today’s machine-to-machine communications that support such “mission-critical” operations. LTE technology meets this growing demand, providing CIIs with high speed data connectivity that yields more precise decision-making and improved community safety.¹

The need for access to advanced, secure, and robust wireless services to support CIIs is vital to the industry. As the American Petroleum Institute and Energy Telecommunications And Electrical Association has highlighted, “a shortage of radio spectrum is jeopardizing the energy industry’s ability to continue developing energy resources safely and efficiently.”² In particular, “petroleum and natural gas companies are pressed to find spectrum to satisfy the need for

¹ See Alcatel Lucent, LTE (Long Term Evolution) for Public Safety, <http://www.alcatel-lucent.com/public-safety/lte> (last visited Jan. 31, 2014).

² See American Petroleum Institute and Energy Telecommunications And Electrical Association, *The Pressing Need for Spectrum in the Energy Industry*, October 31, 2012 (“API/ENTELEC Statement”) at 1, attached to a November 1, 2012, *ex parte* notice by Keller and Heckman LLP, filed on behalf of API and ENTELEC in WT Docket No. 02-68, <http://apps.fcc.gov/ecfs/document/view.jsessionid=d99TQITV2vmLQKWQh0lcPrvwwQ1GMb92z2RkjMtr2Gg0myQJbHmf!-224088840!-56284754?id=7022052805>.

person-to-person and machine-to-machine communications and to ensure safe, reliable, and efficient operations of critical infrastructure.”³

Traditional consumer wireless networks are unable to meet the network security and reliability needs of CIIs as such networks are engineered to provide “best efforts” services. Secure VPRN services deliver real-time and high-speed data transmission from remote field sites to corporate data centers over an encrypted network operating on a single, secure platform. These vital data transmissions serve many functions, including voice and data applications, supervisory control, and data acquisition communications with remote facilities, as well as the extension of circuits to areas unserved by commercial carriers, with monitoring, security and emergency response. Perhaps the most important benefit of VPRN services is increased workplace safety. By virtue of the remote, real-time monitoring and operations control options, VPRN services greatly reduce travel time driving to manually monitor sites which is the number one cause of death and injury in many remote industrial operations.

We respectfully urge the Commission to consider the critical need for CIIs to retain their existing VPRN services as it reviews the proposed transaction.

Respectfully submitted,



Robert J. Ryan
Assistant Secretary

cc (via email): Louis Peraertz
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³ API/ENTELEC Statement at 2.