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October 19, 2016

VIA ELECTRONIC FILING

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

Re: WP Docket No. 16-261

Dear Ms. Dortch:

On October 18, 2016, Mark Crosby, President & CEO of the Enterprise Wireless Alliance (“EWA”), Robin Cohen, EWA Executive Director of Regulatory Affairs and Spectrum Strategies, and the undersigned met with Matthew Pearl, Roger Noel (via telephone), Scot Stone, and Melvin Spann, all of the Wireless Telecommunications Bureau. EWA expressed its continued support for more extensive incumbent access to 800 MHz Expansion Band (“EB”) and Guard Band (“GB”) spectrum than proposed by the FCC in the above-identified proceeding.

EWA expressed its concern that the volume of applications for new Specialized Mobile Radio (“SMR”) systems likely to be filed for EB/GB spectrum would result in the frequency coordination process becoming the “game of chance” the FCC already has admonished frequency advisory committees (“FACs”) to prevent¹ and could cause FAC gridlock that would leave this spectrum unassigned for an extended period. It also noted that disputes among disgruntled applicants might require FCC resolution that would further delay access to this long-awaited spectrum. For illustrative purposes, EWA provided the FCC with the attached data, extracted from the FCC’s Universal Licensing System, demonstrating the volume of applications for new SMR systems filed and granted for EB/GB spectrum in some of the least populated areas of the nation.

¹ City of Aventura, *Memorandum Opinion and Order*, 28 FCC Rcd 4439 (PSHSB 2013).

Ms. Marlene H. Dortch, Secretary

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This letter is being filed electronically, in accordance with Section 1.1206(b) of the Commission's Rules, 47 C.F.R. § 1.1206(b), for inclusion in the record in this proceeding.

Sincerely,

Elizabeth Sachs

Elizabeth R. Sachs

Attachment

cc: Attendees (via email)