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November 6, 2014

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

Accepted/Files

NOV - 6 2014

**Federal Communications Commission
Office of the Secretary**

Re: FCC File Nos. 0006325482 and 0006491930

Dear Ms. Dortch:

This responds to the October 20, 2014 letter (“Letter”) from Spectrum Networks Group, LLC (“SNG”) and its wholly owned subsidiary, M2M Spectrum Networks, LLC (“M2M”) (collectively, the “Parties”) as the Letter relates to the above-identified applications. The Letter poses questions about the applicants’ business qualifications and the loading information provided by them, as well as the coordination of the applications by the Enterprise Wireless Alliance (“EWA” or “Alliance”).

The Parties apparently do not understand the scope of the Alliance’s operations or the role the FCC has assigned to Frequency Advisory Committees (“FACs”) such as EWA. Unlike SNG, EWA does not generate applications for its own use. It receives applications from as many as fifty (50) individuals and organizations daily, most of which prepare the applications themselves and send them to EWA for frequency coordination. The Alliance will process approximately 9,500 requests this year. Applications are routed among multiple processors based on an assessment of their workload to minimize the processing time for all filings. Thus, it is not likely that any one coordinator would have processed both the Golden State Communications, Inc. (“Golden State”) application and the application from 5G Properties, LLC (“5G”) that the Parties complain duplicated the Golden State technical parameters. If they were handled by the same individual, it is not likely that the processor would have recalled an earlier request in sufficient detail to realize that the later application seemingly replicated its technical information.¹ Moreover, contrary to the Parties’ apparent belief, the FCC in 1986 determined that FACs are not required to “make a final determination on eligibility, permissible usage, or whether the use of a particular communication facility is in the public interest” when processing an application². If the applicant provides an eligibility statement that on its face comports with

¹ The suggestion in the letter that EWA is charged with investigating the marital and other familial relationships among persons identified as the electronic signatory or contact for tens of thousands of applications fails any common sense test.

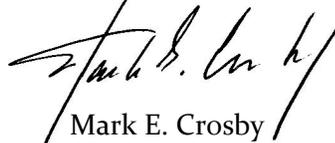
² *Frequency Coordination in the Private Land Mobile Radio Services*, Report and Order, 103 FCC2d 1093 at ¶ 20 (1986).

the FCC's requirements, as 5G's does,³ it is the FCC's responsibility, not the Alliance's, to evaluate that eligibility statement when it considers the application. The Commission has ample experience and tools at its disposal should it require clarification of any applicant's qualifications for the spectrum it has requested.

It may be that SNG has challenged the Alliance's involvement in these applications, because EWA questioned applications filed by SNG itself, as well as those prepared and filed by SNG on behalf of its application customers, because their eligibility statements, in EWA's opinion, are not consistent with the Part 90 requirements for 900 MHz Industrial/Business spectrum. Those applications remain pending, albeit amended with waiver requests seeking relief from those eligibility requirements. EWA is confident that the FCC will exercise the responsibility it has reserved to itself and make a final determination as to whether a grant of the particular communications facilities requested in the SNG-related applications is in the public interest.

Please contact me should further information be necessary from EWA in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark E. Crosby". The signature is stylized and written in a cursive-like font.

Mark E. Crosby
President/CEO

cc: Pantelis Michalopoulos (via email)
Christopher Bjornson (via email)

³ The same is true for the application filed by Scramjet Development ("Scramjet") that the Letter questions. EWA does agree that the loading shown for that system was incorrect and is being amended.