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November 21, 2024

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, N.E.
Washington, D.C. 20554

Re: GN Docket No. 17-258
***Ex Parte* Presentation**

Dear Ms. Dortch:

The Enterprise Wireless Alliance (“EWA”) is a national trade association representing business enterprises, wireless sales and service providers, hardware and software system vendors, and technology manufacturers. The Alliance also represents a significant number of commercial service providers that offer primarily two-way dispatch communications for business and governmental customers. Some EWA members have acquired auctioned Priority Access Licenses (“PALs”) in the Citizens Broadband Radio Service (“CBRS”) in the 3.55-3.7 GHz band. Other members operate on CBRS spectrum as unlicensed General Authorized Access (“GAA”) users. Certain EWA-member technology vendors offer equipment that operates on CBRS spectrum.

The CBRS band has become a spectrum option for certain EWA members with a need for localized coverage whose use cases can be met with the tiered prioritization rights and the Spectrum Access System (“SAS”) process that manages channel assignments in the band. EWA generally supports the Federal Communications Commission (“FCC”) objective of promoting investment in CBRS and its proposals for protecting federal operations and facilitating spectrum access for broadband, both commercial and private. It only cautions that this effort should not be at the expense of entities that already have invested in this spectrum whether as PAL licensees or as GAA users. The FCC’s decisions in this proceeding should have as a priority that those investments not be undermined or their use of the spectrum compromised.

More specifically, EWA wishes to support certain recommendations in the Comments of the American Petroleum Institute (“API”). Like EWA, API has members using CBRS spectrum with licensed PAL authorizations or with GAA rights. API

commends the FCC's adoption of CBRS rules that have encouraged its use by enterprise and small business entities. EWA agrees. In a telecommunications world that focuses increasingly on commercial broadband services, the vital importance of enterprise entities to the nation's economy and to its day-to-day functioning must be recognized. Some of their wireless needs can be and are met on commercial networks, but many have core responsibilities that cannot be outsourced to the network of a third-party commercial provider. For that reason, EWA fully supports API's suggestion that SAS administrators incorporate a GAA user algorithm that prioritizes spectrum access for small businesses and enterprise customers.¹ Consumer-oriented commercial providers typically have significant spectrum resources with which to meet their requirements while the users identified by API continue to struggle to secure private spectrum to address their internal needs. Giving them first GAA rights is a reasonable way to recognize that reality in this shared band.

EWA supports two other API positions. The very valuable role drones can play in many business operations has become increasingly apparent. They can save time and resources, enhance efficiency, and even reduce exposure to potentially dangerous situations. EWA expects to work with the FCC in identifying more bands where drones can be authorized. In the CBRS band, API recommends that line-of-sight drones be authorized anywhere within a PAL service area with appropriate interference protections for adjacent channel and adjacent service area operations.² It also recommends that they be allowed in low power indoor facilities and in Contained Access Facilities.³ Given the capabilities of SAS operations, EWA is confident they can be designed to allow this use while protecting against interference.

Finally, API members have what likely are unique needs to operate offshore, particularly in the Gulf of Mexico. API has proposed several provisions that would facilitate the use of CBRS spectrum in support of those activities.⁴ EWA defers to API's expertise in defining how best to accomplish that objective and urges the FCC to give those proposals the most serious consideration.

¹ API Comments at 7. Since small dispatch operators provide service to the business enterprise and governmental communities, not consumers, EWA would include them in the higher priority scheme proposed by API even though they derive income from the provision of telecommunications services.

² *Ibid.*

³ *Ibid.*

⁴ *Id.* at 2-3.

Ms. Marlene H. Dortch

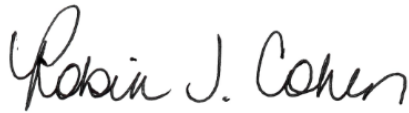
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Please feel free to contact me if you have any questions or comments.

Sincerely,

ENTERPRISE WIRELESS ALLIANCE

A handwritten signature in black ink that reads "Robin J. Cohen". The signature is written in a cursive, flowing style.

Robin J. Cohen

President/CEO

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