

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Bristol-Myers Squibb Company) File No. 0007457084
Request for Waiver to Use)
UHF Airport Terminal Use Frequencies)
In New Jersey and Connecticut)

To: Chief, Wireless Telecommunications Bureau

**REPLY COMMENTS
OF THE
ENTERPRISE WIRELESS ALLIANCE**

The Enterprise Wireless Alliance (“EWA” or “Alliance”), in accordance with Section 1.45 of the Federal Communications Commission (“FCC” or “Commission”) rules, respectfully submits its response to the comments filed jointly by Aviation Spectrum Resources, Inc. (“ASRI”) and FedEx in the above-identified proceeding.¹ EWA fully appreciates the vital importance of Airport Terminal Use (“ATU”) frequencies for both organizations, as well as other entities eligible to use these frequencies to provide critical services in support of aviation activities throughout the nation. Their communications on this spectrum must be interference-free to ensure the safety of those operations. As discussed below, the Alliance is confident that ATU communications will not be compromised by the Bristol-Myers Squibb Company’s (“Bristol-Myers” or “Company”) proposed use, which is limited to defined plant facilities and would be secondary to any ATU operations in the area in which waiver relief is required.

EWA recommended these channels after determining that there were no other Industrial/Business (“I/B”) Pool channels that could be coordinated for centralized trunked FB8 status inside the Company’s campus facilities. Centralized trunked authority is needed so that

¹ Wireless Telecommunications Bureau Seeks Comment on Bristol-Meyers Squibb Company Request for Waiver to Use Airport Terminal Use Frequencies in New Jersey and Connecticut, *Public Notice*, File No. 0007457084, DA 17-479 (rel. May 17, 2017).

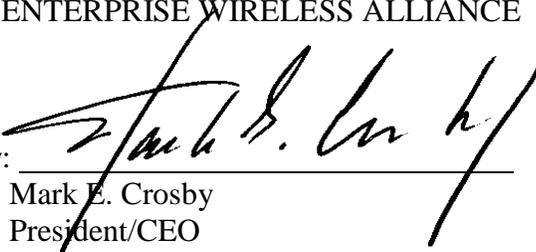
Bristol-Myers may make the most efficient possible use of the limited amount of spectrum it is requesting to support plant operations, security, and environmental and human services at these facilities. Its operations require only very limited range, which is why it has requested repeater power of only 3 watts ERP and portable ERP of 4 watts.

These very limited operations will not preclude the use of these same channels for ATU purposes at airports in the area. Moreover, to avoid any confusion, Bristol-Myers has confirmed to EWA that the Company will accept secondary status vis-à-vis any future co-channel ATU licensee. In the highly unlikely situation wherein a qualified ATU applicant wishes to operate on one of the channels assigned to Bristol-Myers, and finds that it cannot not do so because of interference from Bristol-Myers' system, it will be the Company's responsibility to resolve the problem to the ATU applicant's satisfaction or cease using that channel at the plant in question.

With this clarification, EWA urges the FCC to proceed promptly in granting the waiver relief requested by the Company.

Respectfully submitted,

ENTERPRISE WIRELESS ALLIANCE

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July 3, 2017

CERTIFICATE OF SERVICE

I, Ginger Johnstone, with the law firm of Lukas, LaFuria, Gutierrez & Sachs, LLP, hereby certify that I have, on this 3rd day of July 2017, caused to be forwarded via electronic mail the foregoing Reply Comments to the following:

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/s/ Ginger Johnstone