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November 10, 2016

VIA ELECTRONIC FILING

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

Re: ***Ex Parte* Communication**
MD Docket No. 16-166

Dear Ms. Dortch:

On November 9, 2016, Robin Cohen, Executive Director of Regulatory Affairs and Spectrum Strategies for the Enterprise Wireless Alliance (“EWA”) and undersigned counsel met with Mika Savir and Thomas Buckley, who participated by phone, of the Office of Managing Director. The parties discussed the regulatory fees imposed on Private Land Mobile Radio Service (“PLMRS”) Exclusive Use and Shared Use licenses. EWA explained that while the multi-year regulatory fee for an individual license in these categories is not large, the fees represent a burden to the many small entities that use these licenses in support of their business enterprise or dispatch service activities. PLMRS licenses, for the most part, are issued on a site- and frequency-specific basis so it is common for a licensee to have to hold multiple authorizations to conduct its business activities. Each authorization is subject to a regulatory fee payment when initially issued and at each renewal. These licenses are not issued at the same time, so their 10-year renewals arise randomly throughout the year, making tracking these filing obligations particularly challenging. They also discussed the fact that PLMRS regulatory fees may no longer be needed to fund the Wireless Telecommunications Bureau (“WTB”) activities, since they constitute a tiny fraction of the regulatory fees collected from cellular and other commercial carriers with their hundreds of millions of subscribers. Collecting them may cost the FCC more than they contribute to its efforts. Moreover, only a very small percentage of WTB regulatory activities involve PLMRS licenses.

The parties also discussed the benefits of having all PLMRS licensees provide the FCC with an email address, a commonsense practice in an age of electronic application filings. Having that information also would enable the FCC to more easily and with only minimal cost conduct an audit of PLMRS licenses to ensure that the ULS database represents current and accurate information with regard to PLMRS spectrum actually in use.

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,

A handwritten signature in black ink, appearing to read "Elizabeth R. Sachs". The signature is fluid and cursive, with the first name being the most prominent.

Elizabeth R. Sachs

cc via e-mail: Mika Savir
Thomas Buckley