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June 28, 2019

**VIA ELECTRONIC FILING**

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

**Re: WT Docket No. 17-200**  
***Ex Parte* Presentation**

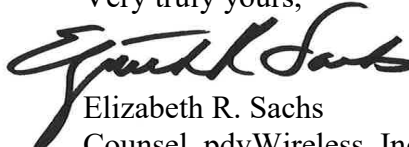
Dear Ms. Dortch:

On June 26, 2019, Chris Guttman-McCabe of CGM Advisors, consultant to pdvWireless, Inc. d/b/a Anterix (“Anterix”), and undersigned counsel for Anterix, met with the Wireless Telecommunications Bureau (“WTB”) staff listed below. The parties discussed certain elements of the Notice of Proposed Rulemaking in this proceeding and the Comments filed in response to it. In particular, the Anterix representatives expressed their support for the “success threshold” solution to the holdout problem as the fastest and most efficient path to clear the broadband segment, and also endorsed the recommendation that complex systems be exempt from any mandatory relocation provisions. They described the interest by certain 900 MHz incumbents in discussing voluntary agreements to relocate out of the broadband segment and the limitations on accommodating them because of the WTB freeze on 900 MHz site-based channels. They also noted the unique licensing position of the Association of American Railroads, which holds an effectively nationwide 900 MHz authorization, and the need to address the requirements of the freight railroads that utilize this spectrum.

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 these proceedings.

Kindly refer any questions or correspondence regarding this matter to the undersigned.

Very truly yours,



Elizabeth R. Sachs

Counsel, pdvWireless, Inc. d/b/a Anterix

cc (via email):  
Lloyd Coward (by phone)  
Anna Gentry  
Stana Kimball  
Roger Noel  
Becky Schwartz  
Scot Stone