



February 15, 2019

Mobility Division
Federal Communications Commission
1270 Fairfield Road
Gettysburg, PA 17235

To Whom It May Concern:

PDV Spectrum Holding Company, LLC, is the largest holder of licensed, nationwide spectrum in the 896/901 – 935/940 MHz band throughout the contiguous United States plus Hawaii, Alaska and Puerto Rico. PDV Wireless currently is pursuing a regulatory proceeding at the Federal Communications Commission (WT Docket No. 17-200) that seeks to modernize and realign a portion of the 900 MHz band to increase its usability and capacity and accommodate the future deployment of broadband technologies and services. The company is focused on developing and offering solutions that leverage its spectrum assets to launch next generation private broadband networks designed to meet the needs of critical infrastructure and enterprise customers.

PDV Wireless has been working closely with the freight rail industry to structure a private spectrum transaction that would benefit both parties and enable the freight rail industry to develop and deploy next-generation communications technology on a contiguous block of 900 MHz channels, which is not feasible with the freight rail industry's current channel configuration in the band. To further that objective, BNSF desires to test new equipment on channels located south of Lubbock, Texas in the MTA A Block currently held by the FCC.

PDV Wireless strongly supports BNSF's application to the Commission to use these channels to test next-generation equipment that will enable one of America's most important and vital transportation industries to meet its future communication needs.

Should the Commission have further questions, please contact the undersigned.

Very truly yours,

A handwritten signature in black ink that reads "Jay Paul". The signature is stylized with a large, looped "J" and a cursive "Paul".

Jay Paul
General Manager
PDV Wireless, Inc.