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October 31, 2016

## **VIA ELECTRONIC FILING**

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

Re: Ex Parte Communication WP Docket No. 15-32

Dear Ms. Dortch:

The Enterprise Wireless Alliance ("EWA") has reviewed the ex parte letter ("Letter") filed on October 24, 2016 on behalf of Telephone Connections, LLC, in the above-entitled proceeding. It also has discussed the Letter with its author, Russell H. Fox. EWA and Mr. Fox agree that the 800 MHz interstitial channels proposed in that proceeding should not be made available for licensing until all incumbents in a NPSPAC region have accepted their replacement channels and no further changes in those channels are contemplated. They also agree that the language in the Letter suggesting that the Commission should not permit the licensing of interstitial channels until "all licensees that are subject to rebanding and that have entered into a Frequency Reconfiguration or similar agreement have completed all steps contemplated by those agreements" should be The Frequency Reconfiguration Agreements ("FRAs") that specify the terms of rebanding arrangements between Sprint Corporation and incumbents include steps, such as completion of the second touch of subscriber units, as well as reconciliation and closing of the FRA, that often are not completed until well after the replacement frequencies have been accepted and placed into operation, and the original frequencies deleted from the incumbent's FCC licenses. It is neither necessary nor in the public interest to delay the availability of 800 MHz interstitial channels until after those actions have been completed, as they do not affect an incumbent's replacement channels.

Ms. Marlene H. Dortch, Secretary October 31, 2016 Page 2

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,

Elizabeth R. Sachs

cc: Russell H. Fox (via email)