



TAKING INGENUITY TO NEW HEIGHTS

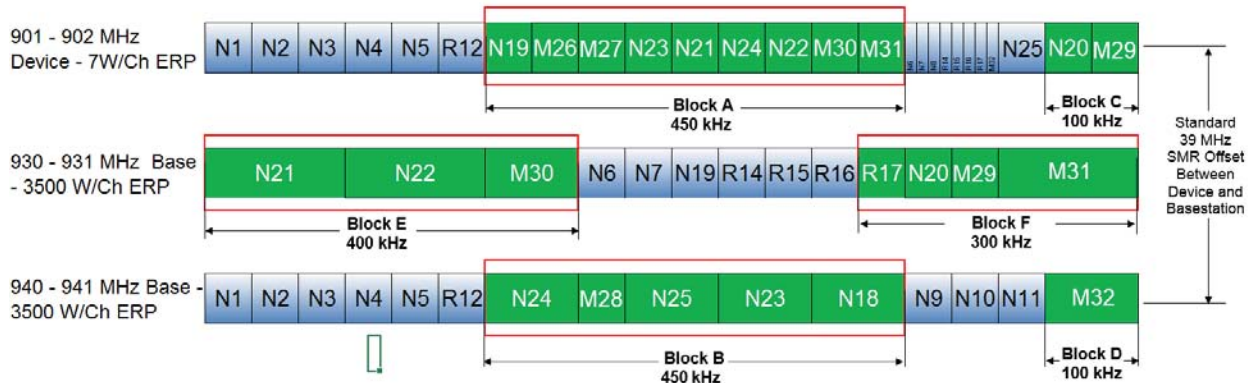
September 28, 2015

To: Roger Marks, IEEE 802.16 Working Group
Mr. Tim Godfrey, Gridman Task Group

RE: Draft PAR and CSD: Amendment for fixed and mobile wireless access in channel sizes less than 1.25 MHz DCN 16-15-0040-01-Gcon

Dear Mr. Godfrey

Space Data, the leader in high altitude balloon borne communications platforms for the military, is also the largest holder of Narrowband PCS (NPCS) spectrum across the US. Through participation in auctions and secondary market transactions between 2001-2008 we assembled nationwide license rights on over half of the 3 MHz allocated to NPCS and in 46 of 51 Major Trading Areas (MTAs) had and hold FCC licenses totaling 1.8 MHz and 1.70 - 1.75 MHz in the other MTAs. Our contiguous licenses displayed below range from 100 kHz to 450 kHz of aggregated bandwidth.



Space Data is supportive of the Draft PAR and CSD to amend the standard to allow for channel sizes less than 1.25 MHz and have several potential users interested in using our 900 MHz spectrum for applications that would be enabled by the proposed Amendment. Several large Investor Owned Utilities have acquired spectrum from us on a regional basis the last few years. These and similar critical infrastructure users would likely expand use of our type of spectrum if the proposed Amendment were adopted and implemented.

Sincerely,

Jerry Knoblach
Chief Executive Officer