

December 10, 2019

Via Email – [roger.noel@fcc.gov](mailto:roger.noel@fcc.gov)  
Mr. Roger Noel  
Chief, Mobility Division  
Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: Volume of Application “Notice of Returns”

Dear Mr. Noel:

Please accept this correspondence as the undersigned FCC-certified frequency advisory committees’ (FACs) request to convene an in-person meeting at either the FCC’s Washington, D.C. or Gettysburg, Pennsylvania offices with appropriate Commission personnel for the purpose of identifying application submittal and application amendment processes that will result in a significant reduction in the volume of Application Return Notices. As licensing agents of the FCC, the FACs have an obligation to process applications on a non-discriminatory basis, and to ensure that applications are informationally complete, in compliance with all applicable FCC Rules and Regulations, and comport with all FCC-approved FAC consensus protocols. The FCC and FACs share the mutual objective of ensuring that licenses are issued as expeditiously as possible, so spectrum is put to use effectively and efficiently, which directly benefits America’s urgent economic and public safety pursuits.

We trust that the FCC shares these fundamental objectives and assume the Commission would support a collaborative dialogue that would facilitate the acceptance and processing of applications. For example, if there are FAC application submittal processes that routinely contribute to application returns, it would be helpful to be made aware of them so that they may be corrected. We also believe that it would be beneficial for the FACs to share with FCC licensing personnel critical information regarding the spectrum management resources FACs utilize to conduct frequency coordination that culminate in application certifications. We also would appreciate the opportunity to discuss the demands placed on FACs today given ever greater spectrum sharing and, simultaneously, the introduction and deployment of multiple advanced technologies that promote spectrum efficiencies.

It is our view that the FCC and its certified FACs are partners whose close collaboration in the license application process will promote the public benefits that accrue from the efficient use of the limited spectrum that has been made available for private land mobile licensees. We look forward to hearing from you regarding this meeting request and are prepared to respond to any questions the Commission may have in the interim.

Sincerely,

American Automobile Association  
Association of American Railroads  
Enterprise Wireless Alliance  
Forest Industries Telecommunication  
MRFAC  
Utilities Telecom Council  
Wireless Infrastructure Association

cc: Scot Stone (Via Email)  
Michael Regiec (Via Email)