

PROMOTING INVESTMENT IN THE 3550-3700 MHZ BAND

Deadline: January 7, 2019

GN Docket No. 17-258

On October 24, 2018, the Commission released a Report and Order in the above captioned docket.

1. The 3.5 GHz Report and Order was published in the Federal Register on December 7, 2018.
2. Pursuant to section 1.429 of the Commission's rules, petitions for reconsideration are due on or before January 7, 2019.
3. The Commission did not include existing, currently licensed, Part 90 Land Mobile Radiolocation Licensees as a classification in Incumbent Protections. These pre-existing Call signs need to be protected just as Nextel's Part 90, 800 MHz, pre-existing Call signs were protected during the 800 MHz Auctions of the late 1990's and early 2000's. A recently released Public Notice did not include these operations and at the very least a Re-Banding program similar to the 2.1 GHz AWS should be part of the conversation. Something needs to be put in place to protect all of these existing licensed operations in the 3550-3700 MHz band.
4. The R&O left out existing Land Mobile Radiolocation Licensees as Incumbents to be protected. Please see outline below from Report and Order:

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5. Part 90 Land Mobile Radiolocation incumbent operations in the 3550-3700 MHz band need to be protected not ignored.

Regards,

CallComm

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