



February 1, 2019

VIA ELECTRONIC FILING

David Furth, Deputy Bureau Chief  
Public Safety and Homeland Security Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Sprint's Status Report on 800 MHz Band Reconfiguration  
WT Docket 02-55  
REPLACEMENT VERSION

Dear Mr. Furth:

Sprint Corporation ("Sprint") hereby files this update regarding 800 MHz band reconfiguration progress with the Federal Communications Commission ("Commission") and the 800 MHz Transition Administrator, LLC ("TA").<sup>1</sup>

As described further below, 800 MHz band reconfiguration continues to make significant progress in the few remaining Regions left to fully complete rebanding. During the month of January, all of the National Public Safety Planning Advisory Committee ("NPSPAC") retuning in the 821- 824 MHz/866-869 MHz portion of the 800 MHz band was completed in both the Region 5 - Southern California Region as well as the Texas – San Antonio NPSPAC Region. ***As a result of these activities, all NPSPAC licensees across the entire United States, including all Border Areas and territories have now retuned.*** By entirely relocating public safety operations from the upper-most portion of the 800 MHz band at 866-869 MHz, thereby removing susceptible public safety operations between Sprint's operations at 862-866 MHz and the Cellular Band operations at 869 – 894 MHz, ***Sprint and public safety have wholly eliminated the greatest causal factor (interleaving of operations) that resulted in harmful interference to public safety operations in the 800 MHz band for over a decade.***

Additionally during the month of January, the County of San Bernardino California completed its 800 MHz retune. San Bernardino County is the largest county in the United States by area, and the County system was one of the largest retunes Sprint and public safety worked to

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<sup>1</sup> In its September 12, 2007 *Third Memorandum Opinion and Order* in the above-captioned proceeding, the Commission required Sprint to submit monthly reports regarding 800 MHz band reconfiguration. See *Improving Public Safety Communications in the 800 MHz Band*, Third Memorandum Opinion and Order, WT Docket No. 02-55, at ¶¶ 29-30 (rel. Sep. 12, 2007) ("*Third Memorandum Opinion and Order*").



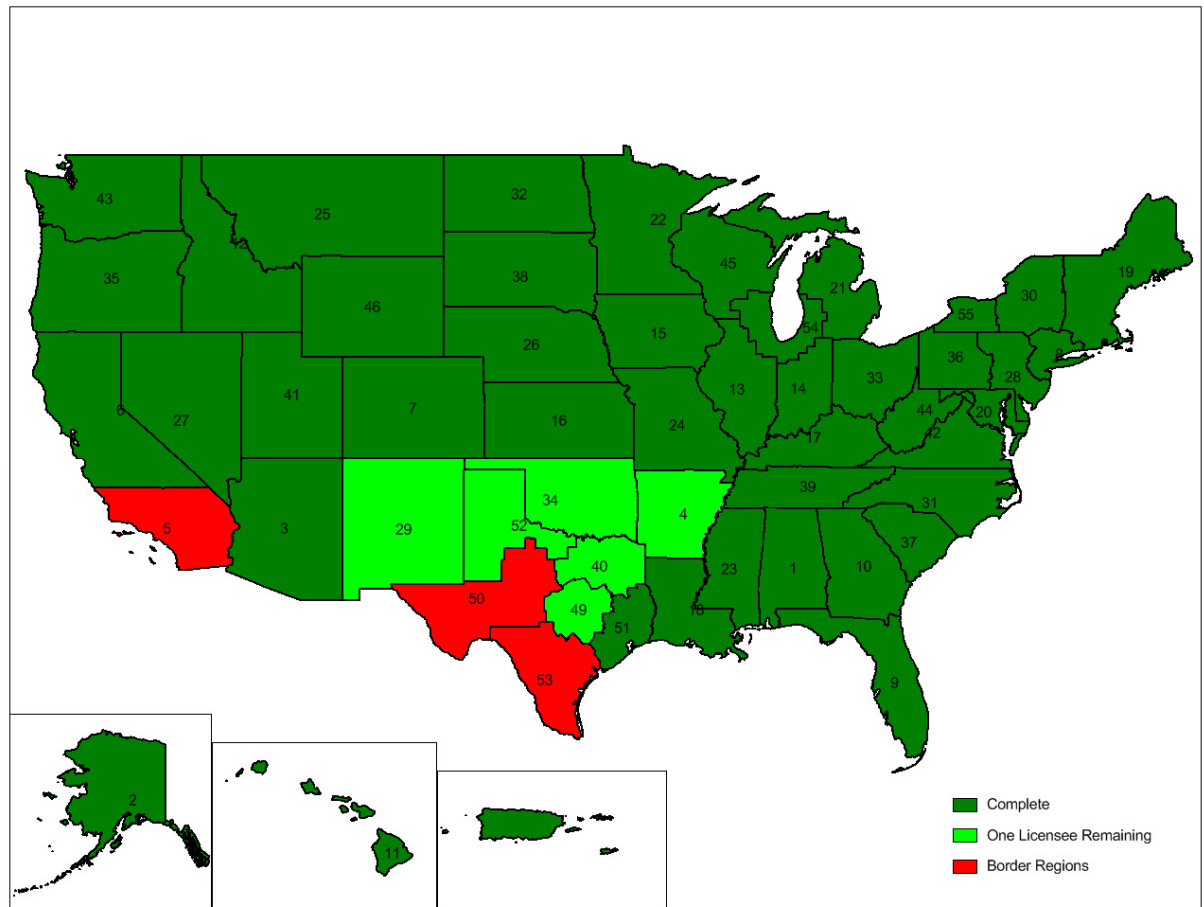
complete during the length of this initiative. As a result of the County completing its retune, Sprint can finally report that all 800 MHz rebanding is complete in the Nevada NPSPAC Region – the forty-sixth NPSPAC Region to be completed.<sup>2</sup>

Currently only 9 of the 55 NPSPAC Regions remain incomplete, with only a handful of public safety licensees left located in only three of these remaining nine NPSPAC Regions (Southern California, El Paso - Texas and San Antonio - Texas). Overall, there are 18 total licensees remaining and only six of those eighteen remaining are public safety. One non-public safety licensee remains in the New Mexico, Oklahoma, Arkansas, Dallas, Austin and Lubbock NPSPAC Regions.<sup>3</sup> All public safety retuning is complete in these six non-Border area NPSPAC Regions. The following is a map showing the status of each NPSPAC Region:

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<sup>2</sup> The forty-six NPSPAC Regions that are completed are: Nevada (Region 27), Arizona (Region 3), Northern California (Region 6), Washington (Region 43), Puerto Rico (Region 47), U.S. Virgin Islands (Region 48), Florida (Region 9), Washington, DC/Baltimore (Region 20), Virginia (Region 42), Eastern Pennsylvania (Region 28), Western Pennsylvania (Region 36), Ohio (Region 33), Kentucky (Region 17), West Virginia (Region 44), North Carolina (Region 31), Mississippi (Region 23), Oregon (Region 35), New York – Buffalo (Region 55), Michigan (Region 21), New York –Albany (Region 30), New York (Region 8), Chicago – Great Lakes (Region 54), Louisiana (Region 18), Tennessee (Region 39), Illinois (Region 13), Alabama (Region 1), South Carolina (Region 37), Indiana (Region 14), New England (Region 19), Texas – Houston (Region 51), Montana (Region 25), Georgia (Region 10), Idaho (Region 12), Missouri (Region 24), Kansas (Region 16), Nebraska (Region 26), Wisconsin (Region 45), Iowa (Region 15), Alaska (Region 2), Minnesota (Region 22), North Dakota (Region 32), Utah (Region 41), Colorado (Region 7), Hawaii (Region 11), Wyoming (Region 46) and South Dakota (Region 38). In addition Sprint was required to reconfigure all of the U.S. Territory’s (collectively Guam/Northern Mariana Islands (BEA 173), and American Samoa (BEA175)) and those areas are also complete.

<sup>3</sup> License Acquisitions is a “non-ESMR” Economic Area (“EA”) licensee whose predecessor in interest in 2006 requested a voluntary relocation to the 800 MHz ESMR band. License Acquisitions acquired these licenses in 2010. In 2017, License Acquisitions requested that the FCC permit it to remain on its existing frequencies and not relocate to the ESMR band. The FCC has denied the request but License Acquisitions has appealed the decision. Accordingly, performance of the License Acquisitions retune has been pending subject to a series of past and recent regulatory proceedings at the FCC which all remaining pending. While this delay impacts ultimate completion of 800 MHz band reconfiguration in eight NPSPAC Regions (Arkansas, New Mexico, Oklahoma, Texas – Dallas, Texas – Austin, Texas – El Paso, Texas – Lubbock and Texas – San Antonio), performance of the retune or rescission of the ESMR election has no impact on the pre- or post-NPSPAC spectrum or any public safety retunes.



Next Sprint provides a NPSPAC Region-by-NPSPAC Region list of the licensees that remain, with an indication of whether the licensee is a NPSPAC (public safety) licensee or a non-NPSPAC licensee (public safety and non-public safety). Sprint will also list in each Region whether any licensees completed their retune during the previous month.



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**Arkansas (Region 4)**

License Acquisitions            Non-NPSPAC

**California – Southern (Region 5)**

Palomar Communications	Non-NPSPAC
Peak Relay	Non-NPSPAC
Agnes Pennington	Non-NPSPAC
J. Paul Getty Trust	Non-NPSPAC
State of California	Non-NPSPAC remaining; previously completed NPSPAC
City of San Diego	Non-NPSPAC remaining; previously completed NPSPAC

During the month of January, the County of San Diego certified that it has completed its entire retune (both NPSPAC and non-NPSPAC). As a result, all NPSPAC retunes are now complete in the Southern California NPSPAC Region. In addition, the County of San Bernardino completed its 800 MHz retune of non-NPSPAC frequencies. The County had previously completed its 800 MHz NPSPAC retune.

The following non-public safety licensees have cleared their existing channels, but have not completed relocation to their new channel assignments since they are dependent upon other moves listed above occurring first:

3KFA	Non-NPSPAC
Paging Systems	Non-NPSPAC
Telephone Connection	Non-NPSPAC
Third District Enterprises	Non-NPSPAC

**Nevada (Region 27)**

During the month of January, the County of San Bernardino completed its 800 MHz retune, which impacted both the California NPSPAC Region and the Nevada NPSPAC Region. As a result of their efforts, all 800 MHz retuning has now been completed in the Nevada NPSPAC Region.

**New Mexico (Region 29)**

License Acquisitions            Non-NPSPAC

**Oklahoma (Region 34)**

License Acquisitions            Non-NPSPAC



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**Texas – Dallas (Region 40)**

License Acquisitions            Non-NPSPAC

**Texas - Austin (Region 49)**

License Acquisitions            Non-NPSPAC

**Texas – El Paso (Region 50)**

License Acquisitions            Non-NPSPAC

Laura and Sergio Rubio        Non-NPSPAC

City of El Paso                  Non-NPSPAC remaining; NPSPAC previously completed

In addition, the following licensee has cleared its existing channels, but has not fully completed relocation to its new channel assignments as it is dependent upon Laura and Sergio Rubbio completing their retune first:

El Paso Independent School District            Non-NPSPAC

**Texas - Lubbock (Region 52)**

License Acquisitions            Non-NPSPAC

**Texas – San Antonio (Region 53)**

License Acquisitions            Non-NPSPAC

Med Care EMS                  Non-NPSPAC

David Peters                    Non-NPSPAC

Tom D. Phillips                Non-NPSPAC

Weslaco ISD                    Non-NPSPAC

During January, two of the remaining seven licensees completed their retunes, as Amercian Electric Power (AEP) and the City of Mission each completed their retunes. The City of Mission was the last remaining NPSPAC licensee in the NPSAC Region. Accordingly, all NPSPAC retuning has been completed in the Texas – San Antonio NPSPAC Region.



The following is a summary of what remains to be returned in each Region:

**Total Licensees Remaining: 18**

Region #	Region Name	Non-ESMR Licensees Remaining to Clear or Retune (Public Safety and Non-Public Safety)	Economic Area Licensee request to relocate to ESMR Band or remain on existing channels
4	Arkansas		1
5	Southern California	10	
27	Nevada	0	
29	New Mexico		1
34	Oklahoma		1
40	Texas - Dallas		1
49	Texas - Austin		1
50	Texas - El Paso	3	1
52	Texas Lubbock		1
53	Texas - San Antonio	4	1
<b>Total Licensees Remaining</b>		<b>17</b>	<b>1</b>

**Category breakdown of 18 remaining licensees by public safety and non-public safety:**

Region #	Region Name	Public Safety	Non-Public Safety
4	Arkansas		1*
5	Southern California	2	8
27	Nevada	0	
29	New Mexico		1*
34	Oklahoma		1*
40	Texas - Dallas		1*
49	Texas - Austin		1*
50	Texas - El Paso	2	2*
52	Texas Lubbock		1*
53	Texas - San Antonio	2	3*
<b>Total Individual Licensees</b>		<b>6</b>	<b>12</b>



\* Counting License Acquisitions (Non-public safety) as one licensee across multiple Regions

**Breakdown of 6 remaining public safety licensees:**

Region #	Region Name	NPSPAC	Non-NPSPAC Public Safety (Interleaved)
5	Southern California	0	2
27	Nevada		0
50	Texas - El Paso		2
53	Texas - San Antonio	0	2
<b>Total Licensees</b>		<b>0</b>	<b>6</b>

Sprint appreciates the continuing opportunity to update the Commission on the substantial progress being made in 800 MHz band reconfiguration. We remain available to discuss this Report at the Bureau’s convenience. Sprint remains committed to completing this important initiative; however, as the information contained herein demonstrates, Sprint cannot complete 800 MHz band reconfiguration until all affected incumbent licensees complete their individual retuning activities.

Should you have any further questions in this matter, please contact the undersigned.

Respectfully submitted

*/s/ James B. Goldstein*

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cc: 800 MHz Transition Administrator