

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Creation of Interstitial 12.5 Kiloherertz Channels in)	WP Docket No. 15-32
the 800 MHz Band Between 809-817/854-862)	RM-11572
MHz)	
)	
Amendment of Part 90 of the Commission's Rules)	WP Docket No. 16-261
to Improve Access to Private Land Mobile Radio)	
Spectrum)	
)	
Land Mobile Communications Council)	RM-11719
Petition for Rulemaking Regarding Interim)	
Eligibility for 800 MHz Expansion Band and)	
Guard Band Frequencies)	
)	
Petition for Rulemaking Regarding Conditional)	RM-11722
Licensing Authority Above 470 MHz)	

To: The Commission

**OPPOSITION TO PETITION FOR RECONSIDERATION
OF THE
LAND MOBILE COMMUNICATIONS COUNCIL**

Respectfully submitted,



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Iota Communications, Inc.
Opposition to the Petition for Reconsideration Filed by LMCC
in the Above Referenced Proceeding

Iota Communications, Inc (“IOTA”) for the reasons articulated below, opposes the proposals in the Petition for Reconsideration filed by LMCC.

In the above identified proceeding, the Commission adopted interference protection contours using the F(50/10) curves for prediction of interference and the F(50/50) curves for prediction of coverage. IOTA firmly believes that the Commission’s decision to deny the initial request to adopt F(50/50) curves for both interference and protection was correct. If the Commission were to adopt the LMCC proposals to assess both coverage and interference based on F(50/50) curves, this could create a situation which the Commission has sought to avoid: an environment where applications could be filed of limited practical use that would block an incumbent from expanding or changing its service contour once the new application is granted. This unfortunate situation would also create economic uncertainty for incumbents to invest in new markets with the plans to expand their service area within their protection area if the LMCC proposal were to be granted, since any expansion within its protection contour could be eliminated at any future time by new applications. The creation of interstitial channels is better suited for allowing incumbents to expand their systems or creating new channels for new entrants, not to allow new licensees to fence existing licensees in.

In summary, IOTA asks the Commission to retain the existing interference and protection contours articulated in the above proceeding. See FCC 18-143.