



March 1, 2019

VIA ELECTRONIC FILING

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

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

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").¹

As described further below, Sprint and the remaining licensees for 800 MHz band reconfiguration continue to make significant progress in completing all of rebanding. Most notably, thanks to the efforts of the J. Paul Getty Trust and the City of San Diego during the month of February, all public safety operations in the San Diego area have been successfully relocated to the non-cellularized portion of the 800 MHz band, thereby fully separating public safety and cellular operations in the 800 MHz band.² As a result, Sprint now has full access to its entire complement of 800 MHz spectrum for both 3G CDMA and 4G LTE operations in all of Southern California, including all of Los Angeles and all of San Diego, including the Border Area. In addition, during the month of February, the last remaining public safety retunes were completed in the Texas – San Antonio NPSPAC Region.

¹ 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*").

² The State of California still must complete its retuning activities within the non-cellularized portion of the 800 MHz band but neither the State nor Sprint inhibit the others operations. Since Sprint's operations are separated from public safety and Sprint is restricted to the cellularized portion of the 800 MHz band, interference risks within the 800 MHz band have been virtually eliminated.

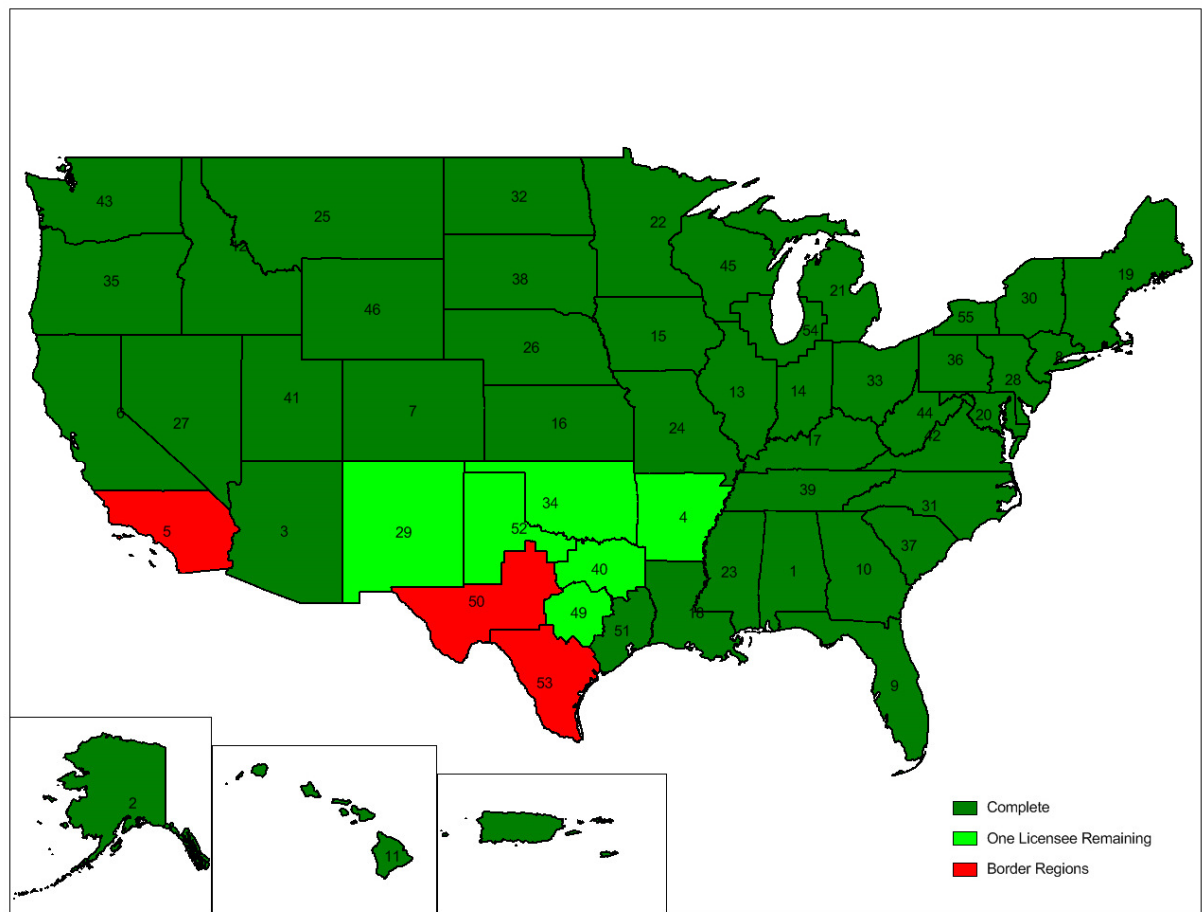
Currently only nine of the fifty-five NPSPAC Regions remain incomplete, with only three public safety licensees left in these remaining nine NPSPAC Regions. Forty-six NPSPAC Regions are fully complete.³ Overall, there are thirteen total licensees remaining and only three of those thirteen remaining are classified as public safety. One non-public safety licensee remains in the New Mexico, Oklahoma, Arkansas, Dallas, Austin and Lubbock NPSPAC Regions⁴ and a total of two non-public safety licensees remain in the San Antonio NPSPAC Region.⁵ All public safety retuning is complete in these seven NPSPAC Regions.

The following is a map showing the status of each NPSPAC Region:

³ 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.

⁴ 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.

⁵ License Acquisitions and Tom Phillips are the only two licensees left to reband in the San Antonio, Texas NPSPAC Region.



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.

Arkansas (Region 4)

License Acquisitions	Non-NPSPAC
----------------------	------------

California – Southern (Region 5)

Palomar Communications	Non-NPSPAC
Peak Relay	Non-NPSPAC
Agnes Pennington	Non-NPSPAC
State of California	Non-NPSPAC remaining; previously completed NPSPAC

During the month of February, the J. Paul Getty Trust completed its retune, which enabled the City of San Diego to complete the remainder of its 800 MHz retune. As a result of the City's completed retune, the entire greater San Diego and Orange County areas have been cleared of public safety operations and Sprint has now access to its full complement of 800 MHz spectrum throughout all of Southern California.

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

New Mexico (Region 29)

License Acquisitions	Non-NPSPAC
----------------------	------------

Oklahoma (Region 34)

License Acquisitions	Non-NPSPAC
----------------------	------------



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 Rubio completing their retune first:

El Paso Independent School District Non-NPSPAC public safety

Texas - Lubbock (Region 52)

License Acquisitions Non-NPSPAC

Texas – San Antonio (Region 53)

License Acquisitions Non-NPSPAC

Tom D. Phillips Non-NPSPAC

During the month of February, Weslaco ISD and Med Care EMS, both public safety entities and David Peters, a non-public safety entity, completed their 800 MHz retunes. All public safety licensees have retuned in this Region.

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

Total Licensees Remaining: 13

Region #	Region Name	Non-ESMR Licensees Remaining to Clear or Retune (Public Safety and Non-Public Safety)	Economic Area Licensee Request to relocate or reconsider move to ESMR Band
4	Arkansas		1
5	Southern California	8	
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	1	1
Total Licensees Remaining		12	1

Category breakdown of 13 remaining licensees by public safety and non-public safety:

Region #	Region Name	Public Safety	Non-Public Safety
4	Arkansas		1*
5	Southern California	1	7
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	0	2*
Total Individual Licensees		3	10

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



Breakdown of 3 remaining public safety licensees:

Region #	Region Name	NPSPAC	Non-NPSPAC Public Safety (Interleaved)
5	Southern California		1
50	Texas - El Paso		2
53	Texas - San Antonio		0
Total Licensees		0	3

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

James B. Goldstein
Senior Counsel - Spectrum
Sprint Corporation
Legal and Government Affairs
900 7th Street, NW
Suite 700
Washington, DC 20001

cc: 800 MHz Transition Administrator