



April 20, 2018

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: WP Docket No. 16-261
Ex Parte Letter

Dear Ms. Dortch:

The Wireless Infrastructure Association (“WIA”) again has urged the Commission to reject the recommendation of the other member organizations that comprise the Land Mobile Communications Council (“LMCC”) to allow a time-limited period for incumbent 800 MHz licensees to add Expansion Band (“EB”) and Guard Band (“GB”) channels to existing systems before opening the spectrum to new entrants. It may be helpful to provide the Commission with a list of those other LMCC members, all of which support that proposal:

- American Association of State Highway and Transportation Officials (“AASHTO”)
- American Automobile Association (“AAA”)
- American Petroleum Institute (“API”)
- Association of American Railroads (“AAR”)
- Association of Public-Safety Communications Officials-International, Inc. (“APCO”)
- Aviation Spectrum Resources, Inc. (“ASRI”)
- Energy Telecommunications and Electrical Association (“ENTELEC”)
- Enterprise Wireless Alliance (“EWA”)
- Forest Industries Telecommunications (“FIT”)
- Forestry-Conservation Communications Association (“FCCA”)
- International Association of Fire Chiefs (“IAFC”)
- International Municipal Signal Association (“IMSA”)
- MRFAC, Inc. (“MRFAC”)
- Telecommunications Industry Association (“TIA”)
- The Monitoring Association (“TMA”)
- Utilities Telecom Council (“UTC”)

Each LMCC member represents both 800 MHz incumbents that need to expand the capacity of their existing facilities and entities that wish to acquire EB/GB channels to establish new systems. Some of those potential applicants operate in bands other than 800 MHz; others are 800 MHz licensees that wish to deploy systems outside their current market area. The LMCC collectively and each of the members listed above individually had to weigh the interests of all their members before adopting the position to which WIA objects. In EWA's case, for example, its Board of Directors, comprised of 800 MHz incumbents and those eager to acquire 800 MHz spectrum, had to approve the LMCC approach. It did so because EWA's Board determined that, on balance, it is in the best interest of the overall Private Land Mobile Radio ("PLMR") user community.

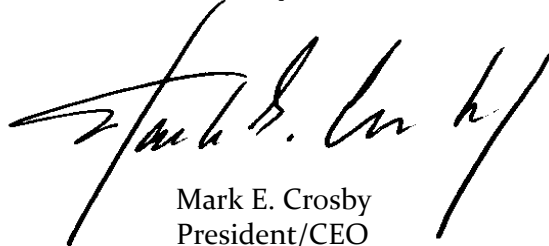
Contrary to the implication in WIA's letter, incumbents are just as likely to introduce innovation as are new entrants. In fact, one could argue that the public safety, manufacturing, utility, aviation, pipeline, and other entities that constitute the PLMR community, companies whose operations are essential to the day-to-day activities of the nation, have proven track records of demanding and deploying increasingly efficient and advanced technology that enable them to provide services to the public and to remain competitive in an increasingly challenging worldwide marketplace.

EWA urges the Commission to adopt the LMCC recommendation regarding the licensing of 800 MHz EB/GB spectrum and to reject WIA's singular opposition to it.

This letter is being filed electronically, in accordance with Section 1.1206(b) of the Commission's Rules, 47 C.F.R. § 1.1206(b), for inclusion in the record in this proceeding.

Kindly refer any questions or correspondence regarding this matter to the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark E. Crosby", is written over a white background. The signature is fluid and cursive, with a long horizontal stroke at the end.

Mark E. Crosby
President/CEO

cc via e-mail:

Donald Stockdale
Lisa Fowlkes
Joel Taubenblatt
David Furth
Scot Stone