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OCT 28 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

October 28, 1994

Mr. William Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

Reference: PR Docket No. 92-235

Dear Mr. Caton:

Pursuant to §1.1206 of the Commission's rules and regulations, Motorola hereby reports that an ex parte presentation was made by representatives of Motorola on October 26, 1994 to Robert McNamara, Kathryn Hosford, Herb Zeiler, and Debra Behlin to discuss issues concerning refarming the Private Land Mobile Bands.

Attached is material used in this meeting.

Regards,

Stuart E. Overby
Assistant Director, Spectrum Planning

SEO:aml

cc: Robert McNamara
Kathryn Hosford
Herb Zeiler
Debra Behlin

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Refarming Key Issue:

- ***Fitting Technology to the Environment and User Requirements***

Levels of Compatibility and Impact on the User

- ***Single Mode***
  - ***Abrupt Migration***
- ***Dual Mode***
  - ***A Partial Solution***
- ***Integrated Backward/Forward Compatibility***
  - ***Total Interoperability During Migration***

Issues:

- ***Low Cost Entry Level Communications***
- ***Technical Flexibility***
- ***Analog to Digital Migration***
- ***Compatibility/Interoperability***
- ***One Step or Two Step Migration***
- ***Adjacent Channel Interference/Intermodulation***
- ***Data Throughput***
- ***Equipment Amortization***
  - ***Mobiles/Portables 8 to 10 Years***
  - ***Infrastructure 15 to 20+ Years***

Technology

- ***A Two Step 12.5/6.25 Plan Allows All Technology Options***
  - ***Low Cost 12.5 FM Analog (Available Today)***
  - ***25/12.5 KHz Analog***
  - ***APCO Project 25 Digital FDMA***
  - ***TDMA (Multiple Slots in 25 KHz)***
  - ***6.25/5 KHz Analog or Digital FDMA***

Band Plan Options

- ***VHF***
  - ***Railroad/Utilities - 15/7.5 KHz***
  - ***Public Safety - 15/12.5/6.25 KHz***
  - ***NTIA - 25/12.5 KHz***
- ***UHF - (450-512 MHz)***
  - ***25/12.5/6.25 KHz***
- ***UHF (NTIA 406-420 MHz)***
  - ***25/12.5 KHz***

PROPOSED PART 88 TRANSITION PLAN

(Example dates assume 1/1/95 effective date of new rules.)	YEAR 2 (e.g., 1/1/1997)	YEAR 12 (e.g., 1/1/2007)	YEAR 18 (e.g., 1/1/2011)	YEAR 26 (e.g., 1/1/2021)
MANUFACTURERS	All new equipment which is sold must be maximum 12.5 KHz* or 12.5 KHz compatible (e.g., dual-mode 25/12.5 KHz; but not single-mode 25 KHz equipment).		All newly type accepted equipment mut be maximum 6.25 KHz* or 6.25 HKz compatible. (e.g.., dual-mode 12.5/6.25 KHz, but not single-mode 25 KHz or 12.5 KHz equipment).	All new equipment which is sold must be maximum 6.25 KHz* or maximum 12.5 KHz if convertible to 6.25 KHz
URBAN SYSTEMS Existing Systems**		All urban systems must operate at no more than 12.5 KHz* bandwidth to retain primary status.		Must operate at no more than 6.25 KHz* bandwidth to retain primary status.
New Systems* **	Must operate at no more than 12.5 KHz* bandwidth to attain primary status.		Must operate at no more than 6.25 KHz* bandwidth to attain primary status.	
RURAL SYSTEMS Existing Systems**				Must operate at no more than 6.25 KHz* to retain primary status.
New Systems* **	Must operate at no more than 12.5 KHz* bandwidth to attain primary status.		Must operate at no more than 6.25 KHz* bandwidth to attain primary status.	
SECONDARY OFFSET USERS AT 450-470 MHZ (All Markets)	May attain co-primary status with other new systems if operations are limited to no greater than 12.5 KHz bandwidth.			Must operate at no more than 6.25 KHz* to attain primary status as against all users.

PROPOSED PART 88 TRANSITION PLAN (continued)

* Bandwidth limitations may be exceeded if the system will operate with efficiency equivalent to or better than the stated bandwidth. For purposes of type acceptance, the radio must be capable of net data throughput of at least 4.8 kbps.

** "Urban Systems" are those located within 100 miles of any of the top 50 urban areas listed at Section 90.761. All other areas would be considered "Rural." Upon request by a petitioning party, other areas of the country may be declared "Urban" upon a showing of increased frequency congestion necessitating early introduction of spectrum efficient technologies.

••• A "new system" is one which is not functionally integrated with an earlier-installed land mobile radio system. To be considered an "existing system," the facilities must be in operation prior to the relevant deadline or must be functionally integrated with such a system. For example, a new repeater site which will be used to extend coverage of an existing system and will relay traffic of mobiles currently operating with an existing system would not be considered a "new system." (See definition of "Land Mobile Radio System" at Section 90.7).