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June 7, 1995

William F. Caton  
Acting Secretary  
Federal Communications Commission  
Room 222  
1919 M Street, N.W.  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Re: Ex Parte Submission  
PR Docket 92-235

Dear Mr. Caton:

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On behalf of Linear Modulation Technology Limited ("LMT"), this letter will respond to the June 1, 1995 letter of APCO Project 25 ("APCO 25") to Chairman Hundt in the above-referenced Docket. The APCO 25 letter states, among other things, that "[o]ur collective experience as users and consumers clearly indicates the land mobile manufacturers have a tendency to promise the consumer much more than they can deliver." APCO 25 thus suggests that the FCC's decision in this Docket should not be driven by "ill founded support of unproven and untested contentions that our needs can be satisfied with new very narrow band technologies." APCO 25 therefore cautions against what it regards as an overly ambitious schedule for phasing out the type acceptance of 12.5 kHz equipment.

In its earlier submissions to this Docket, LMT has thoroughly described the capabilities of its spectrally-efficient 5 kHz Linear Modulation, or "LM," equipment that is now being deployed in the 220 MHz non-nationwide band in the U.S., in several bands in the United Kingdom, in Hungary and, we expect, will soon be deployed in Australia and in South Africa. By year's end, LMT anticipates that over twelve thousand channels of 5 kHz equipment will be in full commercial operation in the U.S. Thus, to the extent that APCO 25 suggests that very narrow band equipment generally is either unproven or untested, LMT must take exception.

LMT, like other manufacturers, is working with the APCO 25 Migration Task Force looking towards the recommendation of the APCO 25 Phase 2 technology. LMT much appreciates the efforts of the APCO 25 Project and understands that the Phase 2 technology is yet to be determined. In this regard, LMT wishes to clarify its understanding that the reference to "6.25 kHz or equivalent standards" for APCO 25, Phase 2 is not intended to be preclusive

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of 5 kHz technology.

Moreover, LMT believes that APCO 25's concern regarding impairment of the equipment markets for 12.5 kHz equipment is misplaced. First, LMT understands that there should be a large market for APCO 12.5 kHz equipment at 800 MHz and above. These bands will remain completely untouched by whatever decisions the Commission reaches in the subject Docket, which concerns the refarming of the Private Land Mobile Radio bands below 512 MHz. Second, as described earlier by LMT in this Docket, 12.5 kHz technology has been available for over twenty-five years and, LMT believes, is technology that is fully mature and available from manufacturers in many nations, and in use in many nations.

If there are any questions concerning this submission, please contact this office.

Respectfully submitted,



Robert B. Kelly  
Counsel to Linear Modulation  
Technology Limited