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Industrial Telecommunications Association, Inc.

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January 20, 1998

Magalie Roman Salas
Secretary
Federal Communications Commission
1919 "M" Street, Room 200
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**Re: Ex Parte Notification
PR Docket No. 92-235**

Dear Ms. Roman Salas:

The Industrial Telecommunications Association, Inc. ("ITA"), pursuant to Section 1.1206(b)(1) of the Commission's Rules, hereby notifies the Commission that the attached memorandum was submitted to Ari Fitzgerald, Legal Advisor to Chairman Kennard, and David Sidall, Legal Advisor to Commissioner Susan Ness. Please enter this memorandum into the record of the above referenced proceeding.

ITA also takes this opportunity to inform the Commission that Mark E. Crosby, and John Kneuer today met with Ari Fitzgerald and David Sidall to discuss the contents of the attached memorandum.

If you have any questions regarding these matters, do not hesitate to contact me.

Respectfully submitted,

John Kneuer
Executive Director
Government Relations

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CICS

Council of Independent
Communication Suppliers

INDUSTRIAL TELECOMMUNICATIONS ASSOCIATION, INC.

Presentation of

OUTSTANDING REFARMING ISSUES

(PR Docket No. 92-235)

◆ **Background**

- In an effort to alleviate the extreme congestion on the Private Land Mobile Radio ("PLMR") bands below 800 MHz, the Commission initiated the so-called "refarming" proceeding in 1992. The goal of this proceeding is to develop an overall strategy for using PLMR spectrum more efficiently in order to meet the growing demands of the private wireless community.
- This rule making proposed a two-fold strategy: 1) consolidate the 20 individual radio services into two broad pools -- Public Safety and Industrial/Business, and 2) migrate all incumbent licensees to "narrowband" channels through a system of type acceptance -- over time, the Commission would only type accept spectrally efficient narrowband equipment.
- To date, the Commission has implemented the first phase of the narrowband transition (*Memorandum Opinion and Order*, rel. December 30, 1996) and completed the pool consolidation (*Second Report and Order*, rel. March 12, 1997). However, a number of crucial issues remain before the Commission on reconsideration.

◆ **Low Power Pool**

- To maximize the benefit of the transition to narrowband channels, the Commission has decided to license narrowband systems on the "offsets" 12.5 kHz removed from existing regularly assignable 25 kHz channels. However, in the bands between 450-470 MHz these offsets are currently occupied by low power licensees. To prevent the dislocation of these low power incumbents, the Commission requested that its Certified Frequency Advisory Committees submit a plan for the accommodation of low power users. This plan, submitted to the Commission by the Land Mobile Communications Council ("LMCC") on June 4, 1997, identified 104 channels that would be reserved for low power use and added technical flexibility to the rules governing low power operation.
- To date, no action has been taken to officially recognize the LMCC's low power proposal.

◆ **Trunking**

- In addition to the transition to narrowband channels, the Commission proposes to increase spectrum efficiency by permitting the deployment of trunking technology in the bands below 800 MHz. This technology permits a licensee to select an unoccupied channel by monitoring several channels at once and dramatically increases spectral efficiency.
- However, the trunking rules the Commission proposed in the *Second Report and Order* have been subject to numerous petitions for reconsideration from nearly all segments of the PLMRS industry. The Commission should act as quickly as practicable to implement a workable trunking plan.

◆ **Geographic Separation for Taxicab Frequencies**

- Because taxicab licensees operate “duplex” systems and most business systems employ “simplex” systems, the Commission traditionally limited the use of taxicab frequencies by business licensees to the areas outside of cities with populations of 50,000 or more. In the refarming proceeding, however, the Commission removed this geographic separation.
- The Commission should reinstate this geographic separation requirement in order to minimize applicant confusion and potential interference between taxicab duplex and business simplex systems.