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October 15, 2014

David Furth, Deputy Chief
Public Safety & Homeland Security Bureau
Federal Communications Commission
Washington, DC 20554

RE: RM-11572

Dear Mr. Furth:

On October 3, 2014, the Land Mobile Communications Council (LMCC) filed an *ex parte* letter regarding the above-referenced petition for rulemaking submitted by the Enterprise Wireless Alliance (EWA) concerning licensing of interstitial channels in the 800 MHz band. The LMCC letter addresses the potential use of F (50,50) curves to predict land mobile radio interference. APCO, which is a member of LMCC, suggests that the Commission's notice of proposed rulemaking seek comments regarding such contour values, how they were derived, and whether the values need to be revisited to ensure protection to incumbent licensees operating with bandwidths of 20 kHz and greater. The Commission should also consider whether there has been testing of the interference values to ensure proper protection is provided to incumbent licensees, and whether appropriate coordination standards will be established.

Respectfully submitted,

/s/

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