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February 20, 2015

Via ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: WT Docket No. 12-40
Amendment of Parts 1 and 22 of the Commission's Rules with Regard to the
Cellular Service, Including Changes in Licensing of Unserved Area

Dear Ms. Dortch:

Pursuant to paragraph 87 of the Federal Communications Commission's ("FCC") Report and Order and Further Notice of Proposed Rulemaking in the above-referenced proceeding,¹ the Enterprise Wireless Alliance ("EWA") hereby expresses its interest in serving as a cellular licensing frequency coordinator.

EWA has thoroughly reviewed the record in this matter and understands the frequency coordinator requirements and obligations. Of critical relevance, EWA understands that, for the most part, the review process will consist of cellular licensing applications claiming at least 50 contiguous square miles of Unserved Area as part of their Cellular Geographic Service Area ("CGSA") or applications seeking an authorization for a new cellular system. EWA further understands that the functions and recommendations of a cellular licensing frequency coordinator are advisory in nature for the applicant and the Commission, and its recommendations are not binding on either party.

As a cellular licensing frequency coordinator, EWA will provide its services on a non-discriminatory nationwide basis, and at a reasonable fee structure that reflects only the actual costs of providing the coordination on a not-for-profit basis. It is unsure at the moment of all actual costs that will be involved, but EWA is willing to share the basis of its fee schedule with the FCC as soon as possible if it is designated as cellular licensing frequency coordinator. EWA is also willing to act in this capacity for as long as the Commission requires; though it suggests that the Commission follow the path it took recently with respect to coordination of Medical Body Area Networks ("MBAN"). In that proceeding, the FCC proposed a 10-year coordination

¹ See In the Matter of Amendment of Parts 1 and 22 of the Commission's Rules with Regard to the Cellular Service, Including Changes in Licensing of Unserved Area, *Report and Order and Further Notice of Proposed Rulemaking*, WT Docket No. 12-40, 27 FCC Rcd 14100 (2014) ("Further Notice").

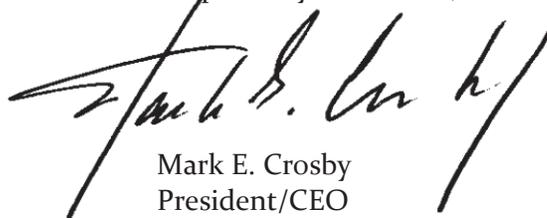
term, after which an entity could elect not to continue in that capacity or the FCC could terminate an entity's designation as a frequency coordinator.²

As demonstrated below, EWA is more than qualified to act as a cellular licensing frequency coordinator. It has experience serving in the capacity of an FCC-certified Part 90 frequency coordinator, processing approximately 10,000 requests for frequency coordination annually, which includes, but is not limited to, requests for channels in the following bands: 30-470 MHz, 470-512 MHz, and 800-900 MHz. Based on its multi-decade history of serving as a frequency coordinator, EWA has the expertise to assist applicants and licensees in securing spectrum solutions to accommodate wireless system operational expectations, and to secure licenses in compliance with FCC operational and technical requirements. It maintains substantial, proprietary computing resources that ensure its recommendations are expeditiously processed in compliance with applicable FCC Rules and Regulations. EWA maintains and updates daily its own database of Part 90 licensees and pending applications. Hence, EWA has the requisite capacity, ability, and willingness to expand these resources to accommodate the requirements imposed on a cellular licensing frequency coordinator should it be selected by the FCC to perform these functions.

In addition, EWA is not opposed to having multiple cellular licensing frequency coordinators, as it currently works with other Part 90 frequency coordinators. However, as the Commission notes in the *Further Notice*, in order to avoid mutually exclusive applications, it is essential that each frequency coordinator provide notification of each application submitted to it for coordination to all other participating coordinators, prior to filing the application with the Commission. In order to accomplish this task, each cellular frequency coordinator must be willing to invest in a system such as the type of system in place for Part 90 coordination data exchanges that will allow a timely, accurate means of preventing the submission of mutually exclusive applications.

Based on the foregoing, EWA reiterates its willingness to serve as a cellular frequency coordinator. Should the FCC require clarification or further information, please direct those inquiries to my attention.

Respectfully Submitted,



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² See Wireless Telecommunications Bureau Opens Filing Window for Requests to be the Frequency Coordinator for Medical Body Area Networks, *Public Notice*, ET Docket No. 08-59, DA 14-1632 (rel. Nov. 10, 2014).