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June 17, 2015

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

Re: *Ex Parte* - WT Docket No. 15-32

Dear Ms. Dortch:

On June 11, 2015, the Public Safety Communications Council ("PSCC") filed an *ex parte* letter ("Letter") in the above-entitled proceeding. The Letter explains that the PSCC is comprised of the four FCC-certified Part 90 public safety frequency coordinators. The PSCC opposes a recommendation in this proceeding by the Enterprise Wireless Alliance ("EWA" or "Alliance") that applicants for 800 MHz interstitial channels should be free to have their applications processed by any Frequency Advisory Committee ("FAC") certified by the FCC to coordinate 800 MHz frequencies.

The PSCC opposes this recommendation on both procedural and substantive grounds. It argues that this issue is outside the scope of the proceeding.[1] It also states that the proposal is based on a faulty foundation: "…the premise of the EWA proposal – that coordination of B/ILT and public safety applications is essentially the same – is incorrect."[2] The Letter identifies three issues in support of the claimed distinction. First, it notes that reciprocal contour analyses are not required when the applicant and adjacent channel licensees are both public safety entities. Second, it advises that public safety coordinators will use TSB-88 analyses if the contour analyses authorized by the FCC fail.[3] Finally, the Letter states that B/ILT coordinators would not be familiar with the particulars of the public safety radio environment.

In making its recommendation, EWA referenced the current coordination procedures for 800 MHz Sprint-vacated spectrum.[4] That spectrum is available exclusively for public safety applicants for the first three years. During the five years that this process has been in place, and

[1] As discussed herein, EWA and other B/ILT FACs already coordinate public safety applications for Sprint-vacated channels in the 800 MHz Mid-Band, so it is not clear why extending this to Mid-Band interstitial channels presents a procedural impediment.
[2] Letter at 1.
[3] The Land Mobile Communications Council ("LMCC") filed Reply Comments in this proceeding in which it proposed contour analyses for the licensing of 800 MHz interstitial channels. It also recommended that, as in other instances, the FCC not include the proposed matrix in the rules, but direct 800 MHz FACs to conduct coordinations consistent with it, including any subsequent refinements, subject to ongoing FCC oversight.
[4] EWA Reply Comments at 5-6.

as the FCC has released additional channels in additional markets, public safety and non-public safety FACs have successfully coordinated many public safety applications for those 800 MHz channels. This process has worked smoothly without any known adverse effects on the public safety spectrum environment.

EWA is not aware of any reason that this experience would not be replicated on 800 MHz interstitial spectrum. The Alliance anticipates that, just as with current 800 MHz co-channel protection criteria, the standards governing the assignment of interstitial channels will be carefully defined[5] and will be followed consistently by all 800 MHz-certified FACs.[6] While some public safety systems certainly may use voting receivers and conduct tactical operations,[7] those considerations would not alter the co-channel and adjacent channel protections standards defining where interstitial or 25 kHz 800 MHz channels may be assigned. It is particularly important that these criteria be applied by all FACs, because rebanding has resulted in the inter-mingling of public safety, B/ILT, and SMR systems on 800 MHz Mid-Band channels, irrespective of their original designation. The successful integration of 800 MHz interstitial channels into this highly complex 800 MHz Mid-Band environment will require careful and consistent coordination analyses in accordance with the interference criteria adopted, irrespective of the applicant's eligibility.

Sincerely,

Mark E. Crosby
President/CEO

cc: Roger Sherman
David G. Simpson
Roger Noel
David Furth

[5] See n. 2 above.
[6] This will include not requiring reciprocal analysis when only public safety entities are involved, assuming the FCC adopts that recommendation.
[7] The Alliance is unclear regarding the PSCC reference to "actual areas of operation" as a unique element to be considered when coordinating 800 MHz public safety applications. Absent securing concurrence from incumbents to the assignment of frequencies at locations that do not satisfy FCC requirements, an option that is always available to all applicants, EWA does not understand how actual, versus licensed, operating parameters would affect the frequency recommendation process, including using TSB-88 analyses when appropriate.