



July 8, 2015

Roger Noel, Chief
Mobility Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

David Furth, Deputy Chief
Public Safety and Homeland Security Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Update of Sprint 800 MHz Call Sign WPRQ760 to Include 866-869 MHz
WT Docket 02-55

Dear Mr. Noel and Mr. Furth:

In accordance with your letter of May 6, 2008 (“FCC Letter”), Sprint Corporation (“Sprint”) hereby requests that the Federal Communications Commission (“Commission”) update its licensing database and reissue Sprint’s 800 MHz Economic Area (“EA”) license to specify, as provided in the Commission’s orders in this proceeding, Sprint’s right to operate in a portion of the 821-824 MHz/866-869 MHz band in the National Public Safety Advisory Committee (“NPSPAC”) Region of Puerto Rico/U.S. Virgin Islands.

800 MHz band reconfiguration entails the retuning of public safety 800 MHz systems from the “old NPSPAC band” at 821-824 MHz/866-869 MHz (hereafter “old NPSPAC band”) to new channel assignments at 806-809 MHz/851-854 MHz (the “new NPSPAC band”). The FCC Letter established a process for Sprint to update its EA licenses during 800 MHz band reconfiguration to provide Sprint its 800 MHz replacement spectrum subject to a series of conditions.¹

¹ On May 23, 2008, Sprint Nextel filed a request to update its EA licenses in the Minnesota, Northern California, New England, Chicago and Florida NPSPAC regions. On June 3, 2008, Sprint Nextel filed a request to update its EA licenses in the New York (Region 8), Nevada, Wisconsin, Indiana, Illinois, Alabama and Georgia NPSPAC Regions. On June 12, 2008, Sprint Nextel filed a request to update its EA licenses in Hawaii, Alaska, Missouri, Utah, Iowa, Kentucky, Tennessee, Michigan, Louisiana and Mississippi NPSPAC Regions. On July 3, 2008, Sprint Nextel filed a request to update its EA licenses in the Eastern Pennsylvania (Region 28), North Carolina, South Carolina, Virginia, West Virginia, Oregon, Washington, DC area (Region 20) and Upstate New York (Region 30) NPSPAC regions. On July 9, 2008, Sprint Nextel filed a request to update its EA licenses in Idaho, Wyoming, Montana, North Dakota, South Dakota, Nebraska, Kansas, Arkansas, Oklahoma and Texas – Lubbock, Texas – Austin, Texas – Dallas, and Texas – Houston. On September 15, 2008, Sprint Nextel filed a request to update its EA licenses in Washington, Western New York, Western Pennsylvania, Ohio and New

Sprint has completed the public safety retunes from the old NPSPAC band to the new NPSPAC band in the Puerto Rico/U.S. Virgin Islands NPSPAC Region and the 800 MHz ESMR band issues, which have long delayed completion of rebanding in Puerto Rico, have been resolved.² Accordingly, Sprint hereby requests that the Commission modify Sprint's FF Block EA license (WPRQ760) to the 800 MHz ESMR band and add the remaining portion of "old NPSPAC band" to replace those 800 MHz channels Sprint has provided public safety incumbents retuning to the new NPSPAC band.³

Sprint recognizes its responsibility to avoid contributing to new commercial mobile radio service ("CMRS") – public safety interference by its use of the 821-824/866-869 MHz band channels. In accordance with the FCC Letter of May 6, 2008, Sprint hereby agrees to accept the following conditions on its updated EA licenses:

1. Sprint will provide appropriate co-channels protection to incumbent licensees pursuant to Section 90.621(b) of the Commission's co-channel protection rules.
2. Sprint will provide adjacent-channel protection in accordance with the standards adopted by the Commission in the *Second Memorandum Opinion and Order* based on the petition filed by NPSPAC Region 8 (New York Metropolitan Area).
3. Sprint will not use and will protect the five nationwide mutual aid channels in the 821-824/866-869 MHz band in each NPSPAC region in which it operates until rebanding is complete in that region.
4. At least 30 days prior to initiating service in the 821-824/866-869 MHz band pursuant to its modified EA licenses, Sprint must provide written notification to every NPSPAC licensee in the affected NPSPAC Region(s), at the contact address listed in the ULS, that it intends to use its modified licenses to operate in the 821-824/866-869 MHz band. In addition, Sprint must provide the same written notification to the Regional Planning Coordinator(s) for the affected NPSPAC region(s).

Mexico. On February 14, 2014, Sprint filed a request to update its EA licenses in Southern California, Arizona, Texas – El Paso, and Texas – San Antonio and on February 18, 2014, Sprint filed a request to update its EA licenses in Guam, American Samoa and Puerto Rico. While the Guam and American Samoa modifications were processed the Puerto Rico modification was not due to the ongoing uncertainty of 800 MHz band reconfiguration in Puerto Rico due to Preferred. That issue has now been fully resolved.

² Sprint has facilitated the relocation of two 800 MHz licensees to the ESMR band: North Sight Communications Inc. (863.0 – 864.75 MHz) and Preferred Acquisitions Inc. (862.0 – 863.0 MHz and 864.75 – 866.575 MHz).

³ Under the Commission's Orders, Sprint is entitled to the remaining "old NPSPAC band" spectrum (866.575 to 869 MHz) as 800 MHz ESMR band replacement spectrum.

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5. Sprint will update the administrator of the CTIA interference website of any new geographic areas in which Sprint deploys facilities in the 821-824/866-869 MHz band.
6. In the event of an interference complaint, Sprint will strictly adhere to the Commission's mandated response timelines and requirements specified in Section 90.674 of the Commission's Rules.
7. Until conclusion of band reconfiguration in the affected NPSPAC region(s), Sprint will protect public safety systems in the 821-824/866-869 MHz band in accordance with the "interim" interference standard specified by the Commission in the 800 MHz Supplemental Order. In addition, Sprint will employ the additional protection methods identified in the Supplemental Order to protect public safety systems in the 821-824/866-869 MHz band that do not meet the signal strength threshold under Commission's interim rules but that do meet the threshold under the Commission's final interference rules.

Sprint respectfully requests expedited treatment of this request in order to facilitate 800 MHz band reconfiguration completion. Should you have any further questions in this matter, please contact the undersigned.

Respectfully submitted

/s/

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List of EA Licenses to be Updated Within Associated NPSPAC Region(s)

EA Name	EA #	Current Block	Call Sign	Addition
Puerto Rico and Virgin Islands	BEA174	FF	WPRQ760	Add partial X Block (866.575 - 869.0 MHz)
				Delete former frequencies (854.125-854.750 MHz)