

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

In the Matter of )  
 )  
Wireless Telecommunications Bureau ) RM-11755  
Seeks Comment on M2M Spectrum )  
Networks Petition for Rulemaking to )  
Allow Specialized Mobile Radio )  
Services Over 900 MHz Business/ )  
Industrial Land Transportation )  
Frequencies )

**To: Chief, Wireless Telecommunications Bureau**

**Reply Comments**

Pursuant to the Commission’s Public Notice dated August 21, 2015,<sup>1</sup> the Alarm Industry Communications Committee (“AICC”), on behalf of its members, hereby submits the following reply comments in opposition to the proposals in the above-captioned proceeding.

AICC is comprised of representatives from Central Station Alarm Association (CSAA), Electronic Security Association (ESA), Security Industry Association (SIA), Bosch Security Systems, Digital Monitoring Products, Digital Security Control, Telular Corp., Honeywell Security, Vector Security, Inc., ADT Security Services, AES-Intellinet, Alarm.com, Bay Alarm, Intertek Testing, NetOne, Inc. (formerly Security Network of America), United Central Control, AFA Protective Systems, Vivint (formerly APX Alarm), COPS Monitoring, DGA Security, Universal Atlantic Systems, Axis

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<sup>1</sup> *Wireless Telecommunications Bureau Seeks Comment on M2M Spectrum Networks Petition for Rulemaking to Allow Specialized Mobile Radio Services Over 900 MHz Business/Industrial Land Transportation Frequencies*, Public Notice, DA 15-944, released August 21, 2015.

Communications, Interlogix, LogicMark, Napco Security, Alarm Detection, ASG Security, Security Networks, Select Security, Inovonics, Linear Corp., Numerex, Tyco Integrated Security, FM Approvals, Underwriters Laboratories, CRN Wireless, LLC and Rapid Response Monitoring.

AICC believes that the M2M Spectrum Networks, Inc. proposal to allow SMR access to the 900 MHz Business/Industrial Land Transportation spectrum would be harmful to eligible business users, because the spectrum would be transferred from a private internal use eligibility model to a for-profit carrier model – even if subscribers were limited to eligibles. It would also likely create a flood of speculative applications – much like the wireless industry has seen in other contexts when the Commission opened up the licensing of frequency bands to new for-profit services. AICC believes that the Lower Colorado River Authority, the American Petroleum Institute, Utilities Telecom Council and other commenters have hit the issue on the head – namely that eliminating the restriction in Rule Section 90.617(c) could enable for-profit SMR entities to apply for all of the remaining 900 MHz B/ILT channels in a particular area, which would then eliminate the ability of incumbents to expand existing private internal communications systems to meet future business needs, and would prevent new entrants from establishing private internal communications systems that are tailored to their specific needs. AICC supports these entities in noting that it is important for the Commission to protect the opportunity for private internal communications, so that so that the scarcity of 800 MHz spectrum for industrial users in many parts of the country does not befall the 900 MHz B\ILT spectrum.

For the foregoing reasons, AICC urges the Commission not to take favorable action on the above-captioned Petition for Rulemaking.

Respectfully submitted,

**THE ALARM INDUSTRY  
COMMUNICATIONS COMMITTEE**

By:



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