



WASHINGTON, DC

DAVID D. RINES
202.416.6751
DRINES@LERMANSENTER.COM

April 18, 2016

VIA ELECTRONIC FILING

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

**Re: Creation of Interstitial 12.5 kHz Channels in the 800 MHz Band, WP
Docket No. 15-32, RM-11572; Notice of *Ex Parte* Presentation**

Dear Ms. Dortch:

On April 14, 2016, Tami Barron, Michael D. Rosenthal, Kristin Dial, and Kasey Chow of Southern Communications Services, Inc. d/b/a SouthernLINC Wireless (“SouthernLINC Wireless”) met with Jon Wilkins and James Schlichting of the Wireless Telecommunications Bureau (“WTB”), at which time they discussed the status of the Commission’s *Notice of Proposed Rulemaking* (“NPRM”) in the above-referenced proceeding.¹

During this meeting, SouthernLINC Wireless reiterated its specific concerns with the Commission’s proposals for the creation of new, full-power, interstitial “offset” channels in the 800 MHz band. In particular, and as described in more detail in its previous filings in this docket, SouthernLINC Wireless expressed its concern that the list of new, full-power, interstitial “offset” channels proposed in the *NPRM* includes certain channels that, if implemented as proposed in the Southeast, would intrude on SouthernLINC Wireless’ licensed 800 MHz enhanced specialized mobile radio service (“ESMR”) spectrum and upset the balance achieved when the Commission realigned the 800 MHz band in 2004.²

¹ / *Creation of Interstitial 12.5 kHz Channels in the 800 MHz Band Between 809-817/854-862 MHz*, WP Docket No. 15-32, RM-11572, Notice of Proposed Rulemaking, FCC 15-17 (rel. Feb. 9, 2015) (“*NPRM*”). It is SouthernLINC Wireless’ understanding that WTB staff members are assisting the Public Safety and Homeland Security Bureau in this proceeding.

² / Comments of SouthernLINC Wireless, WP Docket No. 15-32, RM-11572 (filed May 11, 2015); SouthernLINC Wireless Notice of *Ex Parte* Meeting, WP Docket No. 15-32, RM-11572 (Filed June 18, 2015).



In addition, SouthernLINC Wireless has requested that the Commission refrain from introducing any new 12.5 kHz interstitial allocations within the 1 MHz Expansion Band in the Southeast while continuing to make the current 25 kHz channels within this band available for licensing. Based on SouthernLINC Wireless' experience, ESMR operations and 25 kHz operations in the Expansion Band are able to coexist without any significant problems. However, SouthernLINC Wireless is concerned that the introduction of new, full-power interstitial channels on the 12.5 kHz offsets within the Expansion Band could upset this current balance and result in interference or operational issues between these adjacent bands.

In accordance with the Commission's rules, one copy of this *ex parte* notice is being filed electronically for inclusion in the record of this proceeding.

Very truly yours,

/s/ David D. Rines

David D. Rines
Lerman Senter PLLC
Counsel to SouthernLINC Wireless

cc: Jon Wilkins
James Schlichting