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May 3, 2016

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **WT Docket 12-40 Ex Parte Submission; APCO International (Jeffrey S. Cohen) submission to Federal Communications Commission (FCC) dated November 4, 2015 and March 31, 2016 to WT Docket No. 12-40**

Dear Ms. Dortch:

The Port Authority of New York and New Jersey (Port Authority) respectfully submits to the subject docket technical information related to incidences of harmful radio frequency interference (RFI) experienced by our public safety users of 800 MHz NPSPAC channels. The Port Authority is the licensee of FCC radio authorization, Call Sign WNNM887, on whose channel-frequencies the harmful RFI has been experienced.

By way of background, the Port Authority is a municipal corporate instrumentality and political subdivision of the States of New York and New Jersey, created and existing by virtue of the Compact of April 30, 1921, made by and between the two States, and thereafter consented to by the Congress of the United States. In the Compact, the two States recited their confident belief that a better coordination of the terminal, transportation and other facilities of commerce in the Port of New York would result in great economies benefiting the nation as well as the States and that the future development of such facilities would require the cordial cooperation of the States in the encouragement of the investment of capital and in the formulation and execution of necessary plans.

The Port Authority is charged with providing transportation, terminals and other facilities of trade and commerce within the Port District (an area of about 1,500 square miles in both States, centering about New York Harbor). The Port Authority manages and/or operates all of the region's major commercial airports (Newark Liberty International, John F. Kennedy International, Teterboro, LaGuardia, Atlantic City International, and Stewart International Airports), marine terminals in New Jersey (Port Newark and Port Elizabeth) and New York (Howland Hook and Brooklyn Piers); and its interstate tunnels and bridges (the Lincoln and Holland Tunnels; the George Washington, Bayonne, and Goethals Bridges; and the Outerbridge Crossing). In addition, the Port Authority operates the Port Authority Bus Terminal in Manhattan, the largest facility of its kind in the world, and the George Washington Bridge and Journal Square Transportation Center bus stations. A key

*4 World Trade Center
150 Greenwich Street
New York, NY 10007*

link in interstate commuter travel, the Port Authority also operates the Port Authority Trans-Hudson Corporation (PATH), a rapid rail transit system linking Newark, and the Jersey City and Hoboken waterfronts, with midtown and downtown Manhattan. A number of other key properties are managed by the agency including but not limited to the World Trade Center complex that is still owned and being partially redeveloped by the Port Authority.

In APCO International's (APCO) letters dated November 4, 2015 and March 31, 2016, APCO refers to ex parte meetings with representatives of the FCC to discuss APCO's receipt of interference reports of public safety users. In its November 4, 2015 letter, APCO indicated that "APCO described reports of harmful interference to 800 MHz NPSPAC channels it has received from a number of local government public safety licensees across the country." The Port Authority is one of those licensees.

It is our understanding that the FCC is interested in the technical details of the interference experienced by public safety licensees. The Port Authority, including the Port Authority Police Department (PAPD), has been impacted, when working in the field, by harmful RFI that has rendered 800 MHz NPSPAC portable radio receivers inoperable within the vicinity of an 800 MHz radio frequency (RF) transmitted by wireless carriers in the area. The use of 800 MHz radios is critical to ensure the general safety of the public and the safety and security of the facilities operated by the Port Authority as well as to support its transportation operations.

Attached as Exhibits A – D are spectrum analyzer data for interference experienced during 2015 at various times for locations in New York, NY and Union City, NJ. These data are being submitted to aid the FCC's understanding of the information the Port Authority previously conveyed to APCO. We must note that these Exhibits depict merely a snapshot of the radio frequency environment when the harmful RFI was experienced. We have also reported other harmful RFI instances through the 800 MHz RF interference reporting webpage (www.publicsafety800mhzinterference.com).

In our experience with this reporting procedure, after a report is made the parties meet, preferably at the location of interference, to review the relevant data and participate, in many cases, in completing field tests for the purpose of replication and remediation of the conditions that created the harmful RFI. The wireless carriers have generally been responsive and cooperative with the Port Authority. However, this remediation does not preclude similar harmful RFI on other occasions as we are unable to predict the location, duration or timing of future occurrences. We conjecture that increased cell phone use in the area, triggers the serving cell site(s) to increase their effective radiated power (ERP). As shown in the exhibits, the increased ERP has been measured by Port Authority personnel at ground level at -14 to -18 dBm intensities within the cell operators' frequency band(s) of operation. When the cell phone traffic congestion dissipates, the harmful RFI disappears. Therefore, under "normal" circumstances, which prevail most of the time, our respective 800 MHz communications facilities operate without incident. We have never had reports of the Port Authority causing harmful RFI to cellular radio systems.

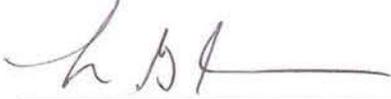
The Port Authority hopes that this submission will contribute to harmonizing the interests of all parties to the common goal of meeting the public interest.

Marlene H. Dortch
May 3, 2016
Page 3 of 3

THE PORT AUTHORITY OF NY & NJ

Pursuant to Section 1.1206 of the Commission's rules, this letter is being filed electronically with your office.

Respectfully submitted,



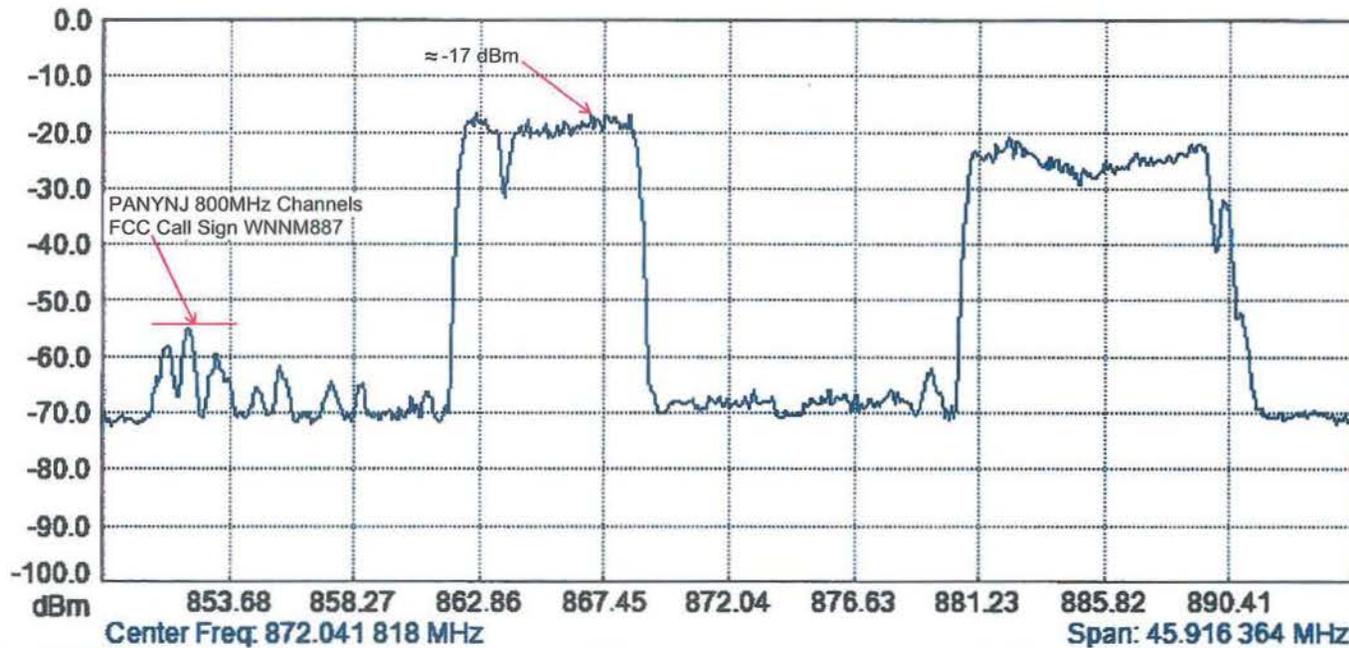
Timothy G. Stickelman
Assistant General Counsel

Attachments: Exhibits A through D

cc: C. Clinton
V. Revankar
V. Rodriguez, Esq.

Spectrum Analyzer Data
 FileName_#264 (05/14/2015 10:06:52 AM)

Spectrum Analyzer



Channel Power Width: 45.916 MHz
 Channel Power: -4.59 dBm
 Span: 45.916 MHz
 Channel Power Density: -81.21 dBm/Hz

Measurement Parameters

		Frequency Span	45.916 364 MHz
Trace Mode	Max Hold	Reference Level	0.000 dBm
Preamp	OFF	Scale	10.0 dB/div
Min Sweep Time	0.001 S	Operator Name	
Reference Level Offset	0.0 dB	Tower	
Input Attenuation	20.0 dB	Serial Number	1129099
RBW	300.0 kHz	Base Ver.	V4.31
VBW	100.0 kHz	App Ver.	V5.69
Detection	RMS	Model	S332E
Center Frequency	872.041 818 MHz	Options	21, 25, 29, 31
Start Frequency	849.083 636 MHz	Date	05/14/2015 10:06:52 AM
Stop Frequency	895.000 000 MHz	Device Name	Comseg_No_Two

EXHIBIT A
 ex parte presentation
 DA 12-40
 Port Authority of New
 York and New Jersey

Location:
 Vicinity: 800 31st St.,
 Union City, NJ

(PANYNJ field
 measurements)

Spectrum Analyzer Data
 FileName_#273 (05/15/2015 09:19:35 AM)

Spectrum Analyzer

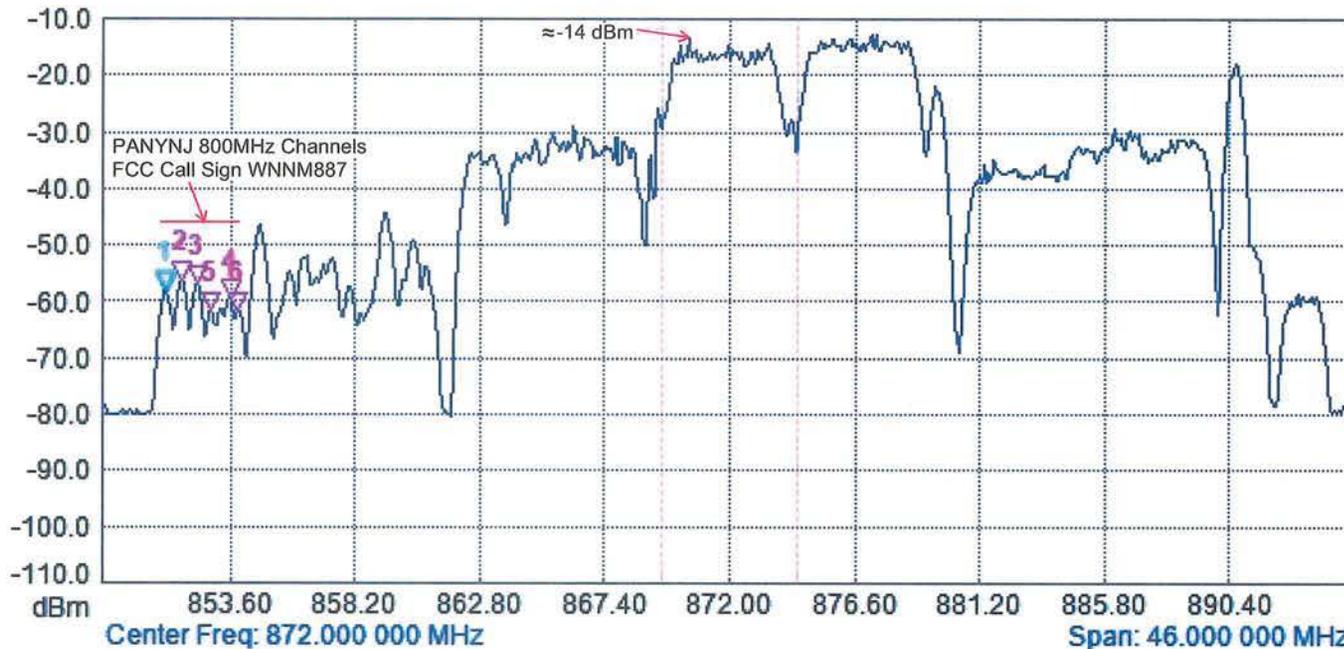


EXHIBIT B
 ex parte presentation
 DA 12-40
 Port Authority of New
 York and New Jersey

Location:
 Vicinity: 200 ft from
 38th St., 9th Ave., New
 York City, NY

(PANYNJ field
 measurements)

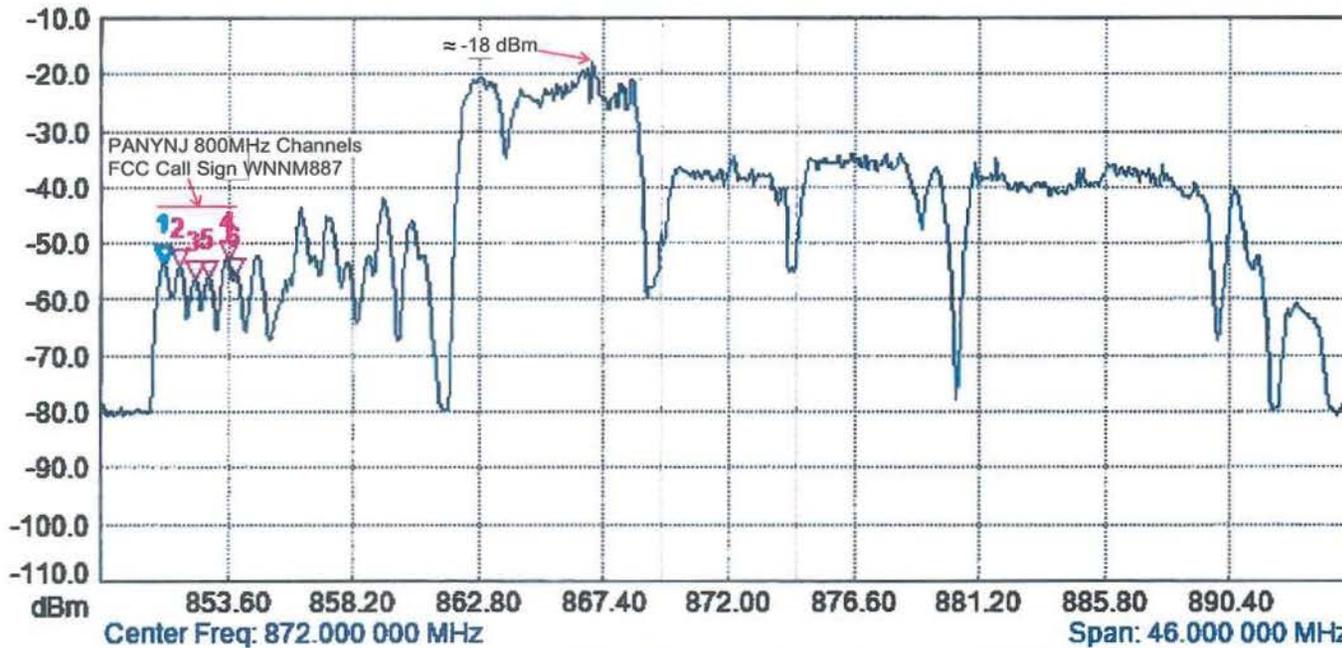
Channel Power	
Channel Power Width: 5.000 MHz	Channel Power: -5.36 dBm
Span: 46.000 MHz	Channel Power Density: -72.35 dBm/Hz

Measurement Parameters

		Frequency Span	46.000 000 MHz
Trace Mode	Max Hold	Reference Level	-10.000 dBm
Preamp	OFF	Scale	10.0 dB/div
Min Sweep Time	0.001 S	Operator Name	
Reference Level Offset	0.0 dB	Tower	
Input Attenuation	10.0 dB	Serial Number	1129099
RBW	300.0 kHz	Base Ver.	V4.31
VBW	100.0 kHz	App Ver.	V5.69
Detection	RMS	Model	S332E
Center Frequency	872.000 000 MHz	Options	21, 25, 29, 31
Start Frequency	849.000 000 MHz	Date	05/15/2015 09:19:35 AM
Stop Frequency	895.000 000 MHz	Device Name	Comseg_No_Two

Spectrum Analyzer Data
 FileName_#277 (05/15/2015 10:16:59 AM)

Spectrum Analyzer



Channel Power	Channel Power Width: 5.000 MHz	Channel Power: -26.51 dBm
	Span: 46.000 MHz	Channel Power Density: -93.50 dBm/Hz

Measurement Parameters

		Frequency Span	46.000 000 MHz
Trace Mode	Max Hold	Reference Level	-10.000 dBm
Preamp	OFF	Scale	10.0 dB/div
Min Sweep Time	0.001 S	Operator Name	
Reference Level Offset	0.0 dB	Tower	
Input Attenuation	10.0 dB	Serial Number	1129099
RBW	300.0 kHz	Base Ver.	V4.31
VBW	100.0 kHz	App Ver.	V5.69
Detection	RMS	Model	S332E
Center Frequency	872.000 000 MHz	Options	21, 25, 29, 31
Start Frequency	849.000 000 MHz	Date	05/15/2015 10:16:59 AM
Stop Frequency	895.000 000 MHz	Device Name	Comseg_No_Two

EXHIBIT C
 ex parte presentation
 DA 12-40
 Port Authority of New
 York and New Jersey

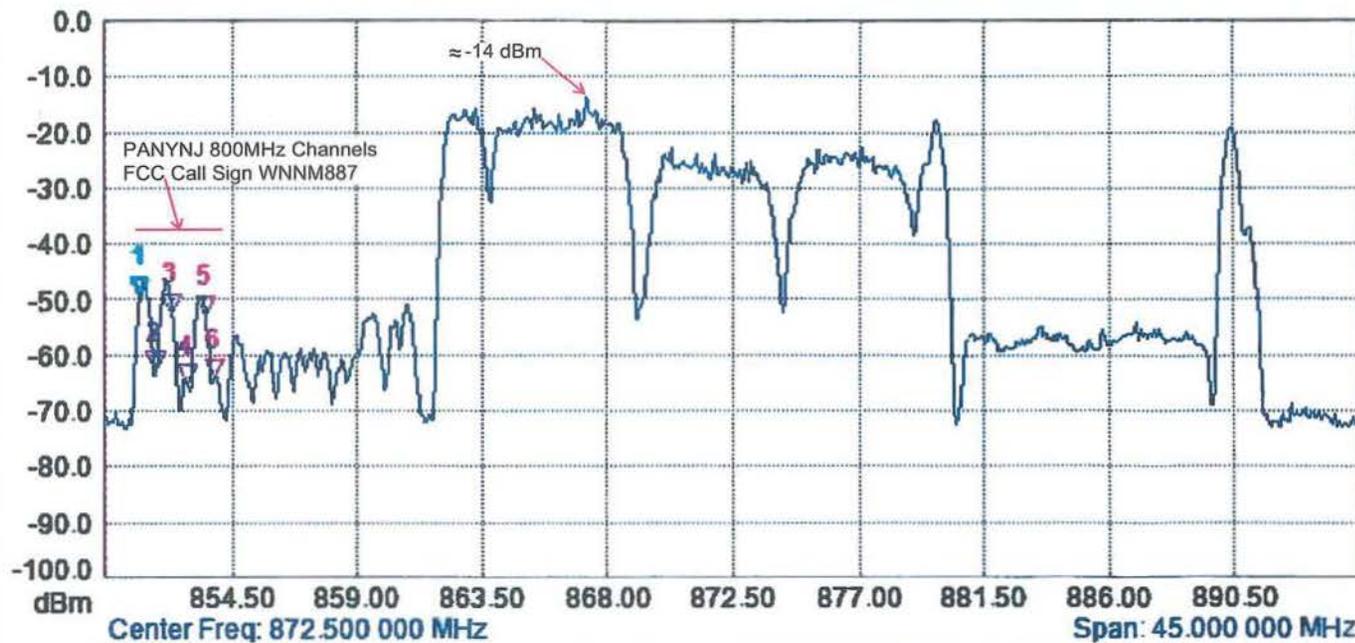
Location:
 Vicinity: 39th St., 10th
 Ave., New York City,
 NY

(PANYNJ field
 measurements)

3300 hudson in parking lot by gate arm/ cc scan and retries

max hold 1 min (11/18/2015 11:47:30 AM)

Spectrum Analyzer



Channel Power
 Channel Power Width: 45.000 MHz Channel Power: -3.95 dBm
 Span: 45.000 MHz Channel Power Density: -80.49 dBm/Hz

Measurement Parameters

		Frequency Span	45.000 000 MHz
Trace Mode	Max Hold	Reference Level	0.000 dBm
Preamp	OFF	Scale	10.0 dB/div
Min Sweep Time	0.001 S	Operator Name	
Reference Level Offset	0.0 dB	Tower	
Input Attenuation	20.0 dB	Serial Number	1129042
RBW	300.0 kHz	Base Ver.	V5.22
VBW	100.0 kHz	App Ver.	V6.57
Detection	RMS	Model	S332E
Center Frequency	872.500 000 MHz	Options	21, 25, 29, 31
Start Frequency	850.000 000 MHz	Date	11/18/2015 11:47:30 AM
Stop Frequency	895.000 000 MHz	Device Name	

EXHIBIT D-1
 ex parte presentation
 DA 12-40
 Port Authority of New
 York and New Jersey

Location:
 Vicinity: 3300 Hudson
 Ave., Union City, NJ

(PANYNJ field
 measurements)

3300 hudson/ in parking lot by other gate arm/ cc scan and retries

max hold 1 min(11/18/2015 11:50:39 AM)

Spectrum Analyzer

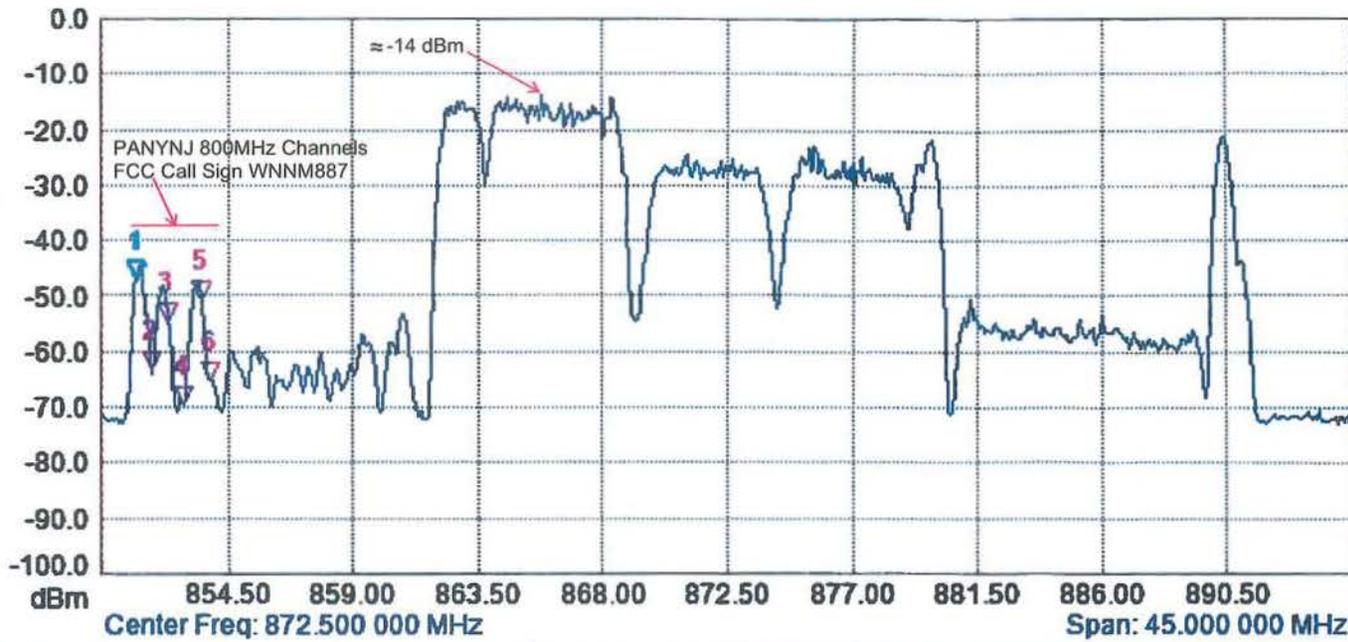


EXHIBIT D-2
ex parte presentation
DA 12-40
Port Authority of New
York and New Jersey

Location:
Vicinity: 3300 Hudson
Ave., Union City, NJ

(PANYNJ field
measurements)

Channel Power	
Channel Power Width: 45.000 MHz	Channel Power: -3.10 dBm
Span: 45.000 MHz	Channel Power Density: -79.63 dBm/Hz

Measurement Parameters

		Frequency Span	45.000 000 MHz
Trace Mode	Max Hold	Reference Level	0.000 dBm
Preamp	OFF	Scale	10.0 dB/div
Min Sweep Time	0.001 S	Operator Name	
Reference Level Offset	0.0 dB	Tower	
Input Attenuation	20.0 dB	Serial Number	1129042
RBW	300.0 kHz	Base Ver.	V5.22
VBW	100.0 kHz	App Ver.	V6.57
Detection	RMS	Model	S332E
Center Frequency	872.500 000 MHz	Options	21, 25, 29, 31
Start Frequency	850.000 000 MHz	Date	11/18/2015 11:50:39 AM
Stop Frequency	895.000 000 MHz	Device Name	

at lukoil gas station/noisy rx/occasional cc scan + retries in open area

max hold 1 min (11/18/2015 11:53:40 AM)

Spectrum Analyzer

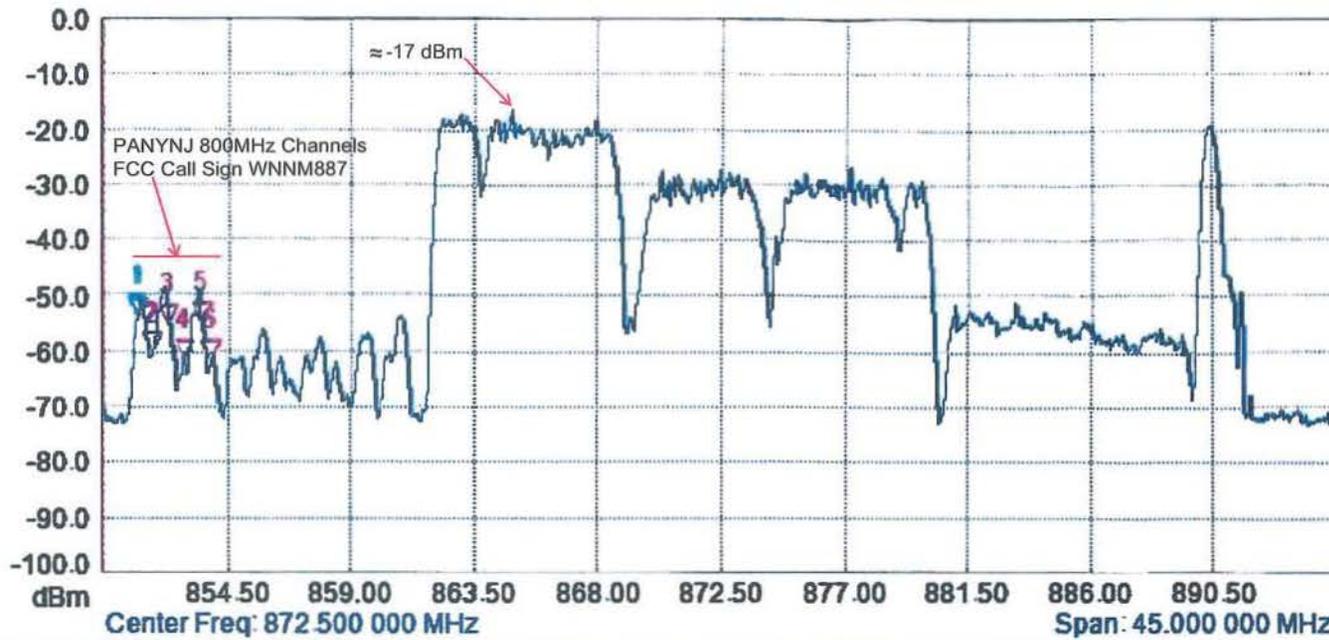


EXHIBIT D-3
ex parte presentation
DA 12-40
Port Authority of New
York and New Jersey

Location:
Vicinity: 3300 Hudson
Ave., Union City, NJ

(PANYNJ field
measurements)

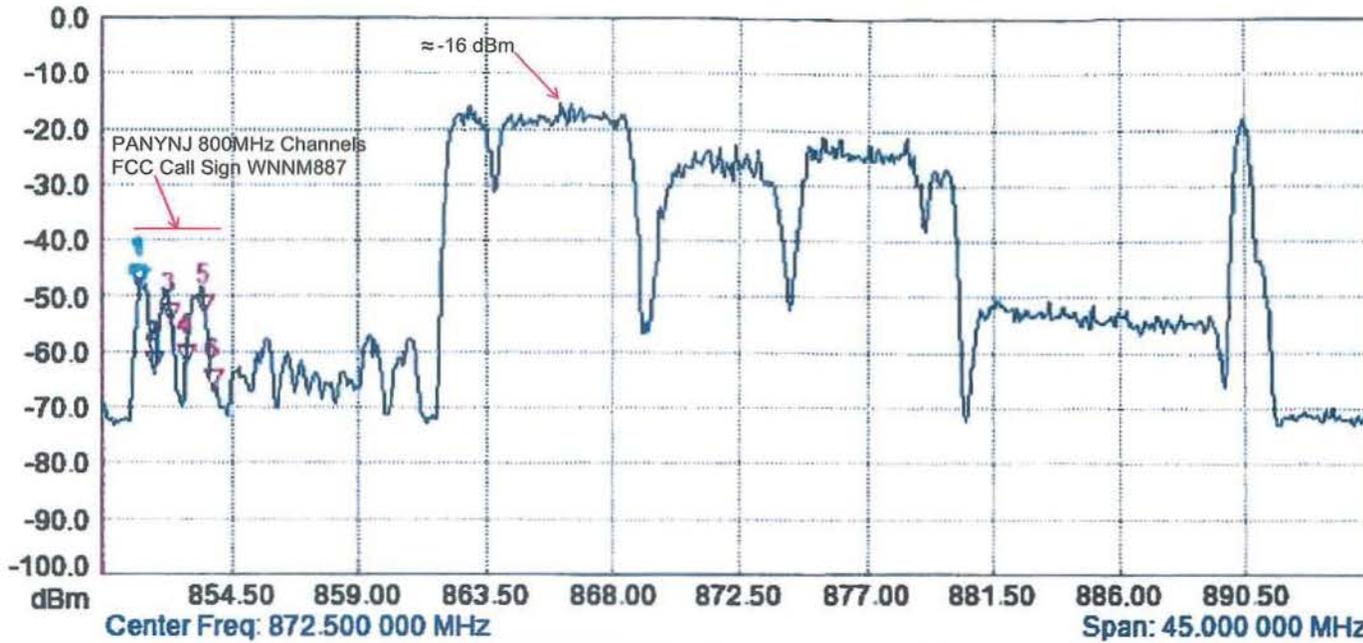
Channel Power	
Channel Power Width: 45.000 MHz	Channel Power: -6.55 dBm
Span: 45.000 MHz	Channel Power Density: -83.08 dBm/Hz

Measurement Parameters

Trace Mode	Max Hold	Frequency Span	45.000 000 MHz
Preamp	OFF	Reference Level	0.000 dBm
Min Sweep Time	0.001 S	Scale	10.0 dB/div
Reference Level Offset	0.0 dB	Operator Name	
Input Attenuation	20.0 dB	Tower	
RBW	300.0 kHz	Serial Number	1129042
VBW	100.0 kHz	Base Ver.	V5.22
Detection	RMS	App Ver.	V6.57
Center Frequency	872.500 000 MHz	Model	S332E
Start Frequency	850.000 000 MHz	Options	21, 25, 29, 31
Stop Frequency	895.000 000 MHz	Date	11/18/2015 11:53:40 AM
		Device Name	

at lukoil in front of garage door/ retries and cc scan
 max hold 1 min (11/18/2015 11:58:25 AM)

Spectrum Analyzer



Channel Power
 Channel Power Width: 45.000 MHz Channel Power: -3.98 dBm
 Span: 45.000 MHz Channel Power Density: -80.51 dBm/Hz

Measurement Parameters

Trace Mode	Max Hold	Frequency Span	45.000 000 MHz
Preamp	OFF	Reference Level	0.000 dBm
Min Sweep Time	0.001 S	Scale	10.0 dB/div
Reference Level Offset	0.0 dB	Operator Name	
Input Attenuation	20.0 dB	Tower	
RBW	300.0 kHz	Serial Number	1129042
VBW	100.0 kHz	Base Ver.	V5.22
Detection	RMS	App Ver.	V6.57
Center Frequency	872.500 000 MHz	Model	S332E
Start Frequency	850.000 000 MHz	Options	21, 25, 29, 31
Stop Frequency	895.000 000 MHz	Date	11/18/2015 11:58:25 AM
		Device Name	

EXHIBIT D-4
 ex parte presentation
 DA 12-40
 Port Authority of New
 York and New Jersey

Location:
 Vicinity: 3300 Hudson
 Ave., Union City, NJ

(PANYNJ field
 measurements)