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FEDERAL COMMUNICATIONS COMMISSION  
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February 2, 2001

Thomas J. Sugrue, Esq.  
Chief, Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room 3C-252  
Washington, D.C. 20554

Re: 1998 Biennial Regulatory Review – 47 C.F.R. Part 90  
– Private Land Mobile Radio Services (WT Docket No. 98-  
182; RM-922)

Replacement of Part 90 by Part 88 to Revise the Private  
Land Mobile Radio Services and Modify the Policies  
Governing Them (PR Docket No. 92-235)

Dear Mr. Sugrue:

On June 28, 2000, the FCC adopted a Report and Order in the above captioned proceeding. As part of that order the Commission addressed a number of items having to do with trunked systems that operate in the private land mobile bands between 150 MHz and 512 MHz. The Commission has recognized the existence of centralized, decentralized and hybrid trunked systems. Further, it has clarified that the traditional Part 90 monitoring requirements applicable to all operations on shared channels apply to decentralized trunked systems and to non-exclusive channels on hybrid systems. The FCC-certified Frequency Advisory Committees (FACs) were charged with specifying the required level of monitoring for their applicants as part of the frequency coordination process.

This letter is to advise the Wireless Telecommunications Bureau that the members of the Land Mobile Communications Council ("LMCC"), as representatives of the FACs,

have agreed on frequency advisory committee-mandated technical monitoring requirements for decentralized and hybrid trunking system infrastructures that are licensed under the "YG" classification and an "FB2" or "FB6" station class code.<sup>1</sup>

In discussions with radio system manufacturers and users, LMCC has determined that the majority of decentralized and hybrid trunked systems employ the Logic Trunked Radio (LTR) protocol. In addition, the majority of LTR systems perform their monitoring function at the repeater by monitoring the receive side of the frequency pair. Therefore, LMCC has adopted monitoring requirements that capitalize on the protocol's design. Those requirements are as follows.

Level 1 Monitoring: This would use the repeater's receiver to monitor for transmit signals coming from co-channel licensee mobile and portable units and would serve to disable the repeater transmitter during the co-channel unit's transmission. This monitoring capability is built into some LTR controllers and may be added externally to other types of LTR-based infrastructure. In fact, most manufacturers require inclusion of this capability when they sell a system. It is estimated that 90-95% of the LTR systems currently operating in the field already have this capability.

Level 2 Monitoring: In certain situations, due either to geographic or RF propagation issues where a repeater may not hear co-channel mobile or portable units, it may be necessary to install a monitor receiver on the repeater transmit frequency. This would require an additional receiver for each "YG"/"FB2" channel and installation of a receive antenna on the applicant's tower.

In order to implement the above-mentioned solutions, the FACs have adopted the following new procedures regarding the certification of applications that propose the deployment of LTR-based decentralized or hybrid trunking systems under a "YG" classification and an "FB2" or "FB6" station class code:

- All LTR-based trunking systems must have "Level 1" monitoring capability as a condition of frequency advisory committee certification. "Level 1" monitoring capability can be easily and economically implemented by licensees.
- Frequency advisory committees may, at their discretion, condition application certification upon the applicant's assertion that "Level 2" monitoring capability will be installed. The FACs recognize that "Level 2" monitoring will require the purchase of

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<sup>1</sup> LMCC notes that two other station class codes; FB4 and FB7, while not widespread in use, are also subject to the guidelines and frequency coordination procedures outlined herein.

additional equipment by the licensee. As such, this requirement will be carefully and judiciously applied.

- In those instances where "Level 2" monitoring capability is recommended by a certified frequency advisory committee to address instances of harmful co-channel interference, the FCC is encouraged to support the frequency advisory committee post-licensing conflict resolution processes.
- The FACs will provide each applicant with a written explanation about the need for employing the appropriate level of monitoring. In some cases, due to factors such as topology, geography, or congestion levels, FACs will use their discretion to request that the Commission "Special Condition" a license grant with the appropriate level of monitoring as recommended by the FAC.

The LMCC believes these standards are consistent with current Commission rules and within the scope of direction given to the FACs by the Biennial Review Order. Nonetheless, we seek the Bureau's acknowledgment that this approach is consistent with the rules, and its support of the Frequency Advisory Committee consensus process. The LMCC looks forward to your immediate response on this matter. If we can be of further assistance, please do not hesitate to contact us.

Sincerely,



Michele Farquhar, Esq.  
President  
Land Mobile Communications Council

cc: D'wana Terry  
Herbert Zeiler  
Mary Schultz