

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )  
)  
Amendment of the Commission's Rules Concerning) WT Docket No. 02-318  
Airport Terminal Use Frequencies in the 450-470 ) RM-10184  
MHz Band of the Private Land Mobile Radio )  
Services )

**COMMENTS  
OF  
THE LAND MOBILE COMMUNICATIONS COUNCIL**

The Land Mobile Communications Council ("LMCC"), pursuant to Section 1.415 of the Commission's Rules, 47 C.F.R. § 1.415, hereby respectfully submits its Comments in the above-captioned proceeding.<sup>1</sup>

**I. Introduction**

LMCC is a non-profit association of organizations representing virtually all users of land mobile radio systems, providers of land mobile services, and manufacturers of land mobile radio equipment. LMCC acts with the consensus, and on behalf, of the vast majority of public safety, business, industrial, private, commercial and land transportation radio users, as well as a

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<sup>1</sup> See Amendment of the Commission's Rules Concerning Airport Terminal Use Frequencies in the 450-470 MHz Band of the Private Land Mobile Radio Services, WT Docket No. 02-318, RM-10184, Notice of Proposed Rulemaking, (rel. October 10, 2002) (NPRM).

diversity of land mobile service providers and equipment manufacturers. Membership includes the following organizations:

- Aeronautical Radio, Inc. (ARINC)
- American Association of State Highway and Transportation Officials (AASHTO)
- American Automobile Association (AAA)
- American Mobile Telecommunications Association, Inc. (AMTA)
- American Petroleum Institute (API)
- Association of American Railroads (AAR)
- Association of Public Safety Communications Officials-International, Inc. (APCO)
- Central Station Alarm Association (CSAA)
- Forest Industries Telecommunications (FIT)
- Forestry-Conservation Communications Association (FCCA)
- Industrial Telecommunications Association, Inc. (ITA)
- Intelligent Transportation Society of America, Inc. (ITSA)
- International Association of Fire Chiefs (IAFC)
- International Association of Fish and Wildlife Agencies (IAFWA)
- International Municipal Signal Association (IMSA)
- Manufacturers Radio Frequency Advisory Committee (MRFAC)
- National Association of State Foresters (NASF)
- Personal Communications Industry Association (PCIA)
- Telecommunications Industry Association (TIA)
- United Telecom Council (UTC)

## **II. Background**

On October 4, 2002, the Commission adopted a *Notice of Proposed Rulemaking* in WT Docket No. 02-318 that seeks to revise the use of Airport Terminal Use (ATU) frequencies in the 450-470 MHz Private Land Mobile Radio Industrial/Business Pool. The proposals, as initiated by a Petition for Rulemaking filed by the Personal Communications Industry Association<sup>2</sup> include: 1.) deleting the 3-watt total output power (TPO) limit for transmitters operating on ATU mobile-only frequencies and adopt a general effective radiated power (ERP) standard; 2.)

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<sup>2</sup> See Petition for Amendment of the Commission's Rules Regarding the Airport Terminal Use Frequencies,

converting the power limit for base transmitters operating on ATU base/mobile frequencies from 20-watts TPO to 100-watts ERP; and 3.) modifying the FCC's Universal Licensing System (ULS) to recognize ATU frequencies. The *NPRM* seeks comment on these issues.

Many of LMCC's member constituents operate on the ATU channels that are the subject of the *NPRM*. Likewise, a number of LMCC members are FCC-certified Frequency Advisory Committees (FACs) that provide frequency coordination services to airline and non-airline applicants/licensees for the ATU channels. As such, the proposed rule revisions are of significant importance to LMCC and we are pleased to present our comments herein.

### **III. Comments**

LMCC supports the proposal to delete the existing 3-watt TPO limit for transmitters operating on ATU mobile-only frequencies. Three watts no longer adequately serves the needs of licensees operating on the ATU channels at many airport facilities as it has in the past. As airports have continued to expand, the distances that must be covered by necessary radio communications have concurrently expanded as well. While this includes obvious expansion above ground, many airports have had to build underground facilities to accommodate baggage handling and other support services. The current power restriction limits the ability of mobile units to talk back to repeaters from such underground facilities or from the distant other side of the airport, thus hampering crucial communications and increasing safety risks for the workers. Permitting a power increase on the mobile side of the ATU frequencies would help to improve such hazardous conditions.

LMCC also supports the proposal to eliminate the TPO restriction for all ATU operations. While mobile communications on airports have been hampered as noted above, base station communications also suffer from the same problems due to the existing power limit. Effective radiated power is a much more accurate measurement of actual operating power than is TPO and would give ATU channel users the flexibility to achieve the maximum power limitation through the use of higher gain antennas or higher power radios. Power stated in terms of ERP also provides frequency coordinators with the best tool for determining the impact that a proposed system will have on co-channel users, both on-airport, and by secondary non-airline licensees located outside of airports.

LMCC agrees that 100-watts ERP is a reasonable power restriction in lieu of a 20-watt TPO limit. It should provide on-airport users with enough power to communicate across expansive distances and RF-hostile environments. LMCC does not believe that such an increase would create problems for secondary licensees. Repeater operations for primary airport use are already authorized for up to 300-watts ERP so a restriction at one-third of that amount should not create any new problems.

But LMCC does *not* believe that all incumbent ATU base authorizations should be automatically converted to 100-watts ERP. While LMCC concurs that communications problems exist at *many* airport facilities, we do not believe such problems exist at *all* airport facilities. Applicants/licensees should have to adhere to the standard licensing and/or modification process to obtain authorization to operate at increased power levels.

LMCC supports the proposal to create a new station class code for ATU channel licenses. A specific class code would serve a useful function in the coordination and licensing process in

that ATU licensees/applicants will be more easily identifiable to FACs, the Commission's licensing staff, and anyone that accesses the search function of the Commission's database for these channels.

## **VII. Conclusion**

WHEREFORE, the premises considered, it is respectfully requested that the Commission act in accordance with the views expressed herein.

Respectfully Submitted,

s:/ Larry A. Miller

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