

Nextel Communications, Inc.
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August 6, 2003

Via Electronic Mail Delivery

Gary Oshinsky
Commercial Wireless Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Interference Status Report, WT Docket No. 02-100

Dear Mr. Oshinsky:

On July 7, 2003, the Wireless Telecommunications Bureau (the "Bureau") issued a Memorandum Opinion and Order ("*MO&O*") in the above-captioned proceeding. In paragraph 26, the Bureau directed Anne Arundel County, Maryland (the "County"), Cingular Wireless ("Cingular") and Nextel to report to the Bureau on the "progress of [interference] mitigation efforts in the County" within thirty and ninety days. Pursuant to the Bureau's directive, Nextel provides its thirty-day update to the Bureau.

Over the past several years, Nextel has demonstrated its commitment to work with the County to avoid, where possible, and manage ongoing interference to the County's public safety communications system that may be related to Nextel's operations. To do so, Nextel has devoted significant resources and personnel, as well as significantly degraded the ongoing operations of its network, in an effort to work with the County to address a large number of interference issues that have been raised by the County. In addition, Nextel has worked extensively with other commercial cellular carriers in the County (Cingular and Verizon) that have been documented contributors to the interference problems plaguing the County. The Bureau's *MO&O* will not change Nextel's commitment – Nextel will continue to work with the County and other carriers to address public safety interference in the County.

Since release of the Bureau's *MO&O*, Nextel has undertaken two significant measures with respect to the County. On July 18, 2003, Nextel representatives, including engineering personnel, met with the County and other carriers to discuss potential measures to address ongoing interference in the County. Since that time, Nextel has participated in joint testing at two "intractable" interference locations (the Edgewater site and the Odenton site) in an attempt to find potential interference mitigation measures that might prove useful. Significantly the modified Motorola XTS5000 radio continued to

experience operational difficulties at the Odenton site. Nextel is not optimistic that further frequency changes on a site-by-site basis will be possible or successful given the spectrum environment in the 800 MHz band, which authorizes incompatible and disparate technologies on interleaved and adjacent spectrum. We agree with the County, which recently stated to the Commission: “Creating sufficient separation between the County’s 800 MHz frequencies and the CMRS carriers’ frequencies is the best method to permanently resolve the interference we face today.”¹ Until the current 800 MHz spectrum environment is changed, no amount of “pre-construction” planning can guarantee interference-free operations for the County’s public safety system.

Nextel has also made progress with the County regarding a proposed frequency exchange. While not an interference mitigation technique, the proposed Nextel-County swap of 800 MHz spectrum will allow the County to build, over the coming years, a more robust public safety communications system, which will expand the County’s coverage and improve its spectrum position. The spectrum exchange, however, “cannot eliminate intermodulation hits on Anne Arundel County channels or limit cellular OOB sufficiently to eliminate all interference. The frequency swap is intended only as one step in a broader interference resolution effort. . . . While this is a positive step, a permanent interference solution requires de-interleaving the channels used for noise-limited public safety systems from those allocated for high-capacity, low-site cellular systems.”²

The Bureau’s *MO&O* encouraged the parties to file a joint report. Nextel is disappointed to report, however, that it was not included in apparent discussions between the other cellular and PCS carriers and the County to craft a joint filing. Nextel is aware of a joint carrier filing and the County’s general agreement to the ongoing procedures outlined in the carrier letter. Nextel was not invited to participate in those discussions until it was too late to provide input and does not agree with some of the characterizations of the status of interference in the County.

Respectfully submitted,

/s/

James B. Goldstein
Senior Attorney – Government Affairs

¹ See letter from Linda Shuett, County Attorney for the County, in WT Docket 02-55 and 02-100 at page 3.

² *Id.*