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February 16, 2005

Michael J. Wilhelm  
Chief  
Public Safety and Critical Infrastructure Division  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Fourth Floor  
Washington, D.C. 20554

Dear Mr. Wilhelm:

In the Supplemental Order and Order on Reconsideration issued in Docket No. 02-55, FCC 04-294, the Commission invited expressions of interest in coordinating SMR pool frequencies in the 800 MHz band. MRFAC, Inc. hereby notifies the Commission of its desire to be certified for SMR pool coordination.

MRFAC's qualifications are a matter of record with the agency. MRFAC is a long-established coordinator of Part 90 private land mobile radio ("PLMR") frequencies. MRFAC (and its National Association of Manufacturers predecessor) was the coordinator for the Manufacturers Radio Service ("MRS") dating back to the 1950s. MRFAC was formally certified as the coordinator for the MRS in the Report and Order in PR Docket No. 83-737, 103 FCC 2d 1093 (1986). Upon consolidation of the individual Radio Services into two pools, Industrial/Business and Public Safety, MRFAC was certified as one of the coordinators for the I/B pool. Second Report and Order in PR Docket No. 92-235, 12 FCC Rcd 14, 307 (1997).

Moreover, MRFAC has been certified to coordinate 800/900 MHz Business and I/LT frequencies. Order, 16 FCC Rcd 8436 (PSPWD 2001). And, just a few months ago, it was certified to coordinate the Part 90 929-930 MHz paging and Special Emergency frequencies below 512 MHz. Public Notice, DA 04-2452, August 4, 2004.

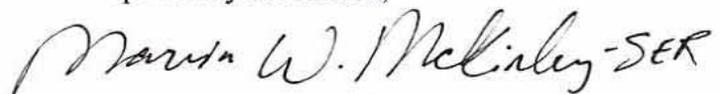
The Supplemental Order references an opportunity for coordinators certified in the "General Category" (id. at para. 68) to express interest in coordinating the SMR pool frequencies. MRFAC has not been certified to coordinate the General Category frequencies. However, as

noted above it has been certified to coordinate Business and I/LT frequencies at 800 and 900 MHz. Moreover, immediately after the reference to the General Category, the Supplemental Order cites to the Order which certified MRFAC for 800/900 MHz B/I/LT coordination. Consequently, while there has been confusion regarding this matter, MRFAC is submitting this letter in the hope that the Commission was intending to entertain expressions of interest from Business and I/LT coordinators.<sup>1</sup>

Finally, MRFAC maintains automated coordination software and electronic notification/filing facilities. Its service to a wide variety of coordination customers is fully compliant with Commission Rules and policies.

Accordingly, for the foregoing reasons, MRFAC urges that it be certified for coordination of 800 MHz SMR frequencies.

Respectfully submitted,



Marvin W. McKinley  
President

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<sup>1</sup> MRFAC notes that this letter is being filed several days beyond the 45 days specified in the Supplemental Order, and requests leave for same. Good cause exists for its acceptance inasmuch as MRFAC's certification would expand coordination customer choice at 800 MHz. This fosters competitive coordination, a long-standing goal of the Commission.