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May 2, 2007

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Washington, DC 20554

Re: WT Docket No. 02-55  
Ex Parte Letter

Dear Ms. Dortch:

This letter is written on behalf of the Georgia Technology Authority (“GTA”), which provides technical services to numerous public safety agencies throughout the State of Georgia and is responsible for the 800 MHz rebanding activities of many of these agencies. It responds to letters dated April 10, 2007, from Rockdale County, Georgia, and April 26, 2007, from Spalding County, Georgia, (the “Counties”) requesting a limited waiver of Section 90.677 of the Commission’s Rules to suspend all frequency reconfiguration planning and negotiations with Sprint-Nextel until September 2008 and asking that 800 MHz band reconfiguration be postponed in the Rockdale County until the analog television station on Channel 69 in Atlanta shuts down in 2009.

GTA agrees with the Counties’ position that interference from TV Channel 69 is likely to occur and that that Sprint-Nextel should be required to provide protection to public safety licensees from such interference. GTA also appreciates the support of the Counties for completion of the study that GTA has proposed to undertake before rebanding is actually implemented – a study that GTA is prepared to undertake as soon as the question of cost reimbursement by Sprint-Nextel is resolved.

However, for the reasons stated in GTA’s letter filed April 26, 2007, responding to a letter dated March 29, 2007, written by the Covington-Newton County 911 Communications

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Center, GTA does not agree that the rebanding process in Georgia should be suspended until 2009.

GTA's position continues to be that an RF study must be completed prior to making any definitive recommendations regarding the timing of rebanding or other ways of addressing the Channel **69** interference problem. Any recommendation(s) would be made in collaboration with the Metro-Atlanta Channel 69 committee.

There are too many personnel dedicated to rebanding who are already at work and are being paid, and the economic cost of holding these persons and their organizations in place would be too high to justify postponing the rebanding process for another two years. Moreover, postponing rebanding in a limited geographic region will risk impairment of critical interoperability capability with jurisdictions not delaying rebanding, imposing unacceptable safety risks to the public.

Respectfully submitted,



Peter Tannenwald  
Ramsey L. Woodworth

Counsel for the Georgia Technology Authority

cc: Mr. David Furth (FCC - by e-mail)  
Ms. Carolyn Hunter, Director, Rockdale County Communications  
Mr. Mike Smith, Director, Covington-Newton County 911 Communications Center  
Mr. Eddie L. Freeman, Chairman, Spalding County Board of Commissioners