



**Sprint Nextel**  
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May 23, 2008

David Furth, Associate Bureau Chief  
Public Safety and Homeland Security Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Joel D. Taubenblatt, Acting Deputy Chief  
Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Update of Sprint Nextel's 800 MHz Licenses to Include 866-869 MHz  
WT Docket 02-55

Dear Mr. Furth and Mr. Taubenblatt:

In accordance with your letter of May 6, 2008 ("FCC Letter"), Sprint Nextel Corporation ("Sprint Nextel") hereby requests that the Federal Communications Commission ("Commission") update its licensing database and reissue the attached list of Sprint Nextel's 800 MHz Economic Area ("EA") licenses to specify, as provided in the Commission's orders in this proceeding, Sprint Nextel's right to operate in the 821-824 MHz/866-869 MHz band in the National Public Safety Advisory Committee ("NPSPAC") Regions of New England, Minnesota, Chicago – Metro, Northern California and Florida.<sup>1</sup>

The FCC Letter recognized that 800 MHz band reconfiguration is at the point where an increasing number of incumbent NPSPAC licensees have either completed or are conducting the physical retunes of their 800 MHz systems from the "old NPSPAC band" at 821-824 MHz/866-869 MHz (hereafter "old NPSPAC band") to new channel assignments at 806-809 MHz/851-854 MHz (the "new NPSPAC band"). Accordingly, Sprint Nextel's licenses must be modified to permit operations on the spectrum being vacated by public safety to include 821-824/866-869 MHz. The FCC Letter updated three of Sprint Nextel's EA licenses in the Colorado NPSPAC

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<sup>1</sup> Sprint Nextel requests that the Commission update Sprint Nextel's 800 MHz "C Block" authorizations to add authority to operate on 821-824/866-869 MHz. Each identified call sign currently covers a unique geography in the relevant NPSPAC Region and currently authorizes geographic-wide operations on 818-821/863-866 MHz. In some cases these EA licenses cross into neighboring NPSPAC regions. Sprint Nextel would, of course, be subject to the conditions described below in these associated neighboring NPSPAC regions as incumbent licensees retune, thereby freeing these replacement channels.

Region to permit Sprint Nextel's use of the 821-824/866-869 MHz band, subject to a series of conditions modeled on those proposed by Sprint Nextel.

The FCC Letter established a process for Sprint Nextel to update its EA licenses in other NPSPAC regions. Accordingly, Sprint Nextel provides its notice that it is ready to incorporate 821-824/866-869 MHz band channels into its iDEN system to replace those 800 MHz channels it provided to public safety incumbents retuning to the new NPSPAC band in the above-referenced NPSPAC regions, and therefore respectfully requests that the Commission update the attached list of EA licenses.

Sprint Nextel recognizes its responsibility to avoid contributing to new commercial mobile radio service ("CMRS") – public safety interference by its use of the 821-824/866-869 MHz band channels. In accordance with the FCC Letter of May 6, 2008, Sprint Nextel hereby agrees to accept the following conditions on its updated EA licenses:

1. Sprint Nextel will provide appropriate co-channels protection to incumbent licensees pursuant to Section 90.621(b) of the Commission's co-channel protection rules.
2. Sprint Nextel will provide adjacent-channel protection in accordance with the standards adopted by the Commission in the *Second Memorandum Opinion and Order* based on the petition filed by NPSPAC Region 8 (New York Metropolitan Area).
3. Sprint Nextel will not use and will protect the five nationwide mutual aid channels in the 821-824/866-869 MHz band in each NPSPAC region in which it operates until rebanding is complete in that region.
4. At least 60 days prior to initiating service in the 821-824/866-869 MHz band pursuant to its modified EA licenses, Sprint Nextel must provide written notification to every NPSPAC licensee in the affected NPSPAC Region(s), at the contact address listed in the ULS, that it intends to use its modified licenses to operate in the 821-824/866-869 MHz band.<sup>2</sup> In addition, Sprint Nextel must provide the same written notification to the Regional Planning Coordinator(s) for the affected NPSPAC region(s).
5. Sprint Nextel will update the administrator of the CTIA interference website of any new geographic areas in which Sprint Nextel deploys facilities in the 821-824/866-869 MHz band.
6. In the event of an interference complaint, Sprint Nextel strictly adhere to the Commission's mandated response timelines and requirements specified in Section 90.674 of the Commission's Rules.

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<sup>2</sup> Sprint Nextel will similarly notify NPSPAC licensees in adjacent regions whose facilities are within 70 miles of Sprint Nextel's proposed EA operations.

*David Furth, Associate Bureau Chief*

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7. Until conclusion of band reconfiguration in the affected NPSPAC region(s), Sprint Nextel will protect public safety systems in the 821-824/866-869 MHz band in accordance with the “interim” interference standard specified by the Commission in the 800 MHz Supplemental Order. In addition, Sprint Nextel will employ the additional protection methods identified in the Supplemental Order to protect public safety systems in the 821-824/866-869 MHz band that do not meet the signal strength threshold under Commission’s interim rules but that do meet the threshold under the Commission’s final interference rules.

Sprint Nextel respectfully requests expedited treatment of this request in order to facilitate 800 MHz band reconfiguration. Should you have any further questions in this matter, please contact the undersigned.

Respectfully submitted

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James B. Goldstein  
Director, Spectrum Reconfiguration

cc: 800 MHz Transition Administrator

**List of EA Licenses to be Updated Within Associated NPSPAC Region(s)**

New England NPSPAC Region 19	BEA001	WPLM547	Bangor, ME
New England NPSPAC Region 19	BEA002	WPLM550	Portland, ME
New England NPSPAC Region 19	BEA003	WPLM553	Boston-Worcester-Lawrence-Lowell
New England NPSPAC Region 19	BEA003	WPQT201	Boston-Worcester-Lawrence-Lowell
New England NPSPAC Region 19	BEA004	WPLM556	Burlington, VT-NY
New England NPSPAC Region 19	BEA010	WPLM574	New York-No. New Jer.-Long Isl
New England NPSPAC Region 19	BEA010	WPOI317	New York-No. New Jer.-Long Isl
New England NPSPAC Region 19	BEA010	WPQS998	New York-No. New Jer.-Long Isl
Florida NPSPAC Region 9	BEA029	WPLM631	Jacksonville, FL-GA
Florida NPSPAC Region 9	BEA029	WPOI332	Jacksonville, FL-GA
Florida NPSPAC Region 9	BEA030	WPLM634	Orlando, FL
Florida NPSPAC Region 9	BEA031	WPLM637	Miami-Fort Lauderdale, FL
Florida NPSPAC Region 9	BEA032	WPLM640	Fort Myers-Cape Coral, FL
Florida NPSPAC Region 9	BEA033	WPLM643	Sarasota-Bradenton, FL
Florida NPSPAC Region 9	BEA034	WPLM646	Tampa-St. Petersburg-Clearwater
Florida NPSPAC Region 9	BEA035	WPLM648	Tallahassee, FL-GA
Florida NPSPAC Region 9	BEA036	WPOI290	Dothan, AL-FL-GA
Florida NPSPAC Region 9	BEA081	WPLM777	Pensacola, FL
Northern California NPSPAC Region 6	BEA151	WPOH360	Reno, NV-CA
Northern California NPSPAC Region 6	BEA162	WPOH391	Fresno, CA
Northern California NPSPAC Region 6	BEA163	WPOH394	San Francisco-Oakland-San Jose
Northern California NPSPAC Region 6	BEA164	WPOH397	Sacramento-Yolo, CA
Northern California NPSPAC Region 6	BEA165	WPOH399	Redding, CA-OR
Northern California NPSPAC Region 6	BEA166	WPOH401	Eugene-Springfield, OR-CA
Minnesota NPSPAC Region 22	BEA105	WPOH243	La Crosse, WI-MN
Minnesota NPSPAC Region 22	BEA106	WPOH246	Rochester, MN-IA-WI
Minnesota NPSPAC Region 22	BEA106	WPOI399	Rochester, MN-IA-WI
Minnesota NPSPAC Region 22	BEA106	WPQT225	Rochester, MN-IA-WI
Minnesota NPSPAC Region 22	BEA107	WPOH249	Minneapolis-St. Paul, MN-WI-IA
Minnesota NPSPAC Region 22	BEA107	WPOI364	Minneapolis-St. Paul, MN-WI-IA
Minnesota NPSPAC Region 22	BEA107	WPQT228	Minneapolis-St. Paul, MN-WI-IA
Minnesota NPSPAC Region 22	BEA109	WPOI405	Duluth-Superior, MN-WI
Minnesota NPSPAC Region 22	BEA110	WPOH257	Grand Forks, ND-MN
Minnesota NPSPAC Region 22	BEA113	WPOH263	Fargo-Moorhead, ND-MN
Minnesota NPSPAC Region 22	BEA116	WPOH271	Sioux Falls, SD-IA-MN-NE
Chicago Metro NPSPAC Region 54	BEA062	WPLM727	Grand Rapids-Muskegon-Holland, MI
Chicago Metro NPSPAC Region 54	BEA063	WPLM730	Milwaukee-Racine, WI
Chicago Metro NPSPAC Region 54	BEA063	WPOI344	Milwaukee-Racine, WI
Chicago Metro NPSPAC Region 54	BEA064	WPLM733	Chicago-Gary-Kenosha, IL-IN-WI
Chicago Metro NPSPAC Region 54	BEA064	WPOI347	Chicago-Gary-Kenosha, IL-IN-WI
Chicago Metro NPSPAC Region 54	BEA065	WPLM736	Elkhart-Goshen, IN-MI
Chicago Metro NPSPAC Region 54	BEA104	WPOH240	Madison, WI-IA-IL
Chicago Metro NPSPAC Region 54	BEA104	WPOI396	Madison, WI-IA-IL