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June 3, 2008

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

Joel D. Taubenblatt, Acting Deputy Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th 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 York (Region 8), Nevada, Wisconsin, Indiana, Illinois, Alabama and Georgia.¹

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

¹ 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.²

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.³ In addition, Sprint

² On May 23, 2008, Sprint Nextel filed a request to update its EA licenses in the Minnesota, Northern California, New England, Chicago and Florida NPSPAC regions. This request included three EA licenses (WPLM574, WPOI317, and WPQS998) that included geography that covered a portion of the New England NPSPAC Region as well as the New York (Region 8) NPSPAC region. Because these three licenses are the only three EA licenses Sprint Nextel requires modification of in New York (Region 8) and, to avoid any confusion, Sprint Nextel is relisting these three EA licenses in the instant request to indicate our intent to initiate service in the old NPSPAC band in the near future in New York, as well as in New England. In all other cases, Sprint Nextel is not listing more than once EA licenses that cover parts of more than one NPSPAC region.

³ Sprint Nextel will similarly notify NPSPAC licensees in adjacent regions whose facilities are within 70 miles of Sprint Nextel's proposed EA operations.

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.
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

/s/

James B. Goldstein
Director, Spectrum Reconfiguration

cc: 800 MHz Transition Administrator

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

New York NPSPAC Region 8	BEA010	WPLM574	New York-No. New Jer.-Long Island	Request Already Pending
New York NPSPAC Region 8	BEA010	WPOI317	New York-No. New Jer.-Long Island	Request Already Pending
New York NPSPAC Region 8	BEA010	WPQS998	New York-No. New Jer.-Long Island	Request Already Pending
Nevada NPSPAC Region 27	BEA153	WPOH366	Las Vegas, NV-AZ-UT	
Wisconsin NPSPAC Region 45	BEA059	WPLM718	Green Bay, WI-MI	
Wisconsin NPSPAC Region 45	BEA059	WPOI385	Green Bay, WI-MI	
Wisconsin NPSPAC Region 45	BEA060	WPLM721	Appleton-Oshkosh-Neenah, WI	
Wisconsin NPSPAC Region 45	BEA108	WPOI402	Wausau, WI	
Indiana NPSPAC Region 14	BEA049	WPLM688	Cincinnati-Hamilton, OH-KY-IN	
Indiana NPSPAC Region 14	BEA049	WPQT237	Cincinnati-Hamilton, OH-KY-IN	
Indiana NPSPAC Region 14	BEA066	WPLM739	Fort Wayne, IN	
Indiana NPSPAC Region 14	BEA067	WPLM742	Indianapolis, IN-IL	
Indiana NPSPAC Region 14	BEA067	WPOI350	Indianapolis, IN-IL	
Indiana NPSPAC Region 14	BEA067	WPOK458	Indianapolis, IN-IL	
Indiana NPSPAC Region 14	BEA069	WPLM748	Evansville-Henderson, IN-KY-IL	
Indiana NPSPAC Region 14	BEA070	WPLM751	Louisville, KY-IN	
Indiana NPSPAC Region 14	BEA070	WPOI296	Louisville, KY-IN	
Illinois NPSPAC Region 13	BEA068	WPOI293	Champaign-Urbana, IL	
Illinois NPSPAC Region 13	BEA072	WPLM757	Paducah, KY-IL	
Illinois NPSPAC Region 13	BEA096	WPOH217	St. Louis, MO-IL	
Illinois NPSPAC Region 13	BEA096	WPOK468	St. Louis, MO-IL	
Illinois NPSPAC Region 13	BEA097	WPOH220	Springfield, IL-MO	
Illinois NPSPAC Region 13	BEA097	WPOI390	Springfield, IL-MO	
Illinois NPSPAC Region 13	BEA100	WPOH229	Des Moines, IA-IL-MO	
Illinois NPSPAC Region 13	BEA100	WPOI393	Des Moines, IA-IL-MO	
Illinois NPSPAC Region 13	BEA101	WPOH231	Peoria-Pekin, IL	
Illinois NPSPAC Region 13	BEA102	WPOH234	Davenport-Moline-Rock Island,	
Alabama NPSPAC Region 1	BEA074	WPLM762	Huntsville, AL-TN	
Alabama NPSPAC Region 1	BEA075	WPLM764	Tupelo, MS-AL-TN	
Alabama NPSPAC Region 1	BEA077	WPLM769	Jackson, MS-AL-LA	
Alabama NPSPAC Region 1	BEA077	WPOI299	Jackson, MS-AL-LA	
Alabama NPSPAC Region 1	BEA078	WPLM771	Birmingham, AL	
Alabama NPSPAC Region 1	BEA078	WPOI358	Birmingham, AL	
Alabama NPSPAC Region 1	BEA079	WPLM773	Montgomery, AL	
Alabama NPSPAC Region 1	BEA080	WPLM775	Mobile, AL	
Georgia NPSPAC Region 10	BEA027	WPLM625	Augusta-Aiken, GA-SC	
Georgia NPSPAC Region 10	BEA027	WPOK441	Augusta-Aiken, GA-SC	
Georgia NPSPAC Region 10	BEA028	WPLM628	Savannah, GA-SC	
Georgia NPSPAC Region 10	BEA028	WPOK443	Savannah, GA-SC	
Georgia NPSPAC Region 10	BEA037	WPLM653	Albany, GA	
Georgia NPSPAC Region 10	BEA038	WPOK450	Macon, GA	
Georgia NPSPAC Region 10	BEA039	WPLM658	Columbus, GA-AL	
Georgia NPSPAC Region 10	BEA039	WPOI376	Columbus, GA-AL	
Georgia NPSPAC Region 10	BEA039	WPOK452	Columbus, GA-AL	
Georgia NPSPAC Region 10	BEA040	WPLM661	Atlanta, GA-AL-NC	
Georgia NPSPAC Region 10	BEA040	WPOI335	Atlanta, GA-AL-NC	
Georgia NPSPAC Region 10	BEA040	WPOK455	Atlanta, GA-AL-NC	
Georgia NPSPAC Region 10	BEA043	WPLM670	Chattanooga, TN-GA	