



**Sprint Nextel**  
2001 Edmund Halley Drive  
Reston, VA 20191  
Office: (703) 433-4212 Fax: (703) 433-4142

June 13, 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 Hawaii, Alaska, Missouri, Utah, Iowa, Kentucky, Tennessee, Michigan, Louisiana and Mississippi.<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.<sup>2</sup>

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>3</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.

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<sup>2</sup> 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. On June 3, 2008, Sprint Nextel filed a request to update its EA licenses in the New York (Region 8), Nevada, Wisconsin, Indiana, Illinois, Alabama and Georgia NPSPAC Regions.

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

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

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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)**

Hawaii NPSPAC Region 11	BEA172	WPOH414	Honolulu, HI
Alaska NPSPAC Region 2	BEA171	WPOH413	Anchorage, AK
Missouri NPSPAC Region 24	BEA092	WPOH206	Fayetteville-Springdale-Rogers
Missouri NPSPAC Region 24	BEA092	WPOK463	Fayetteville-Springdale-Rogers
Missouri NPSPAC Region 24	BEA093	WPOH209	Joplin, MO-KS-OK
Missouri NPSPAC Region 24	BEA094	WPOH212	Springfield, MO
Missouri NPSPAC Region 24	BEA095	WPOH214	Jonesboro, AR-MO
Missouri NPSPAC Region 24	BEA095	WPOK465	Jonesboro, AR-MO
Missouri NPSPAC Region 24	BEA098	WPOH223	Columbia, MO
Missouri NPSPAC Region 24	BEA099	WPOH226	Kansas City, MO-KS
Utah NPSPAC Region 41	BEA143	WPOH344	Casper, WY-ID-UT
Utah NPSPAC Region 41	BEA152	WPOH363	Salt Lake City-Ogden, UT-ID
Utah NPSPAC Region 41	BEA154	WPOH368	Flagstaff, AZ-UT
Iowa NPSPAC Region 15	BEA103	WPOH237	Cedar Rapids, IA
Iowa NPSPAC Region 15	BEA117	WPOH274	Sioux City, IA-NE-SD
Iowa NPSPAC Region 15	BEA118	WPOI408	Omaha, NE-IA-MO
Kentucky NPSPAC Region 17	BEA047	WPLM682	Lexington, KY-TN-VA-WV
Kentucky NPSPAC Region 17	BEA047	WPOI379	Lexington, KY-TN-VA-WV
Kentucky NPSPAC Region 17	BEA048	WPLM685	Charleston, WV-KY-OH
Tennessee NPSPAC Region 39	BEA044	WPLM673	Knoxville, TN
Tennessee NPSPAC Region 39	BEA044	WPOI338	Knoxville, TN
Tennessee NPSPAC Region 39	BEA045	WPLM676	Johnson City-Kingsport-Bristol
Tennessee NPSPAC Region 39	BEA046	WPLM679	Hickory-Morganton, NC-TN
Tennessee NPSPAC Region 39	BEA046	WPOI341	Hickory-Morganton, NC-TN
Tennessee NPSPAC Region 39	BEA071	WPOI356	Nashville, TN-KY
Tennessee NPSPAC Region 39	BEA071	WPSN390	Nashville, TN-KY
Tennessee NPSPAC Region 39	BEA073	WPLM760	Memphis, TN-AR-MS-KY
Tennessee NPSPAC Region 39	BEA073	WPOK461	Memphis, TN-AR-MS-KY
Michigan NPSPAC Region 21	BEA057	WPLM712	Detroit-Ann Arbor-Flint, MI
Michigan NPSPAC Region 21	BEA058	WPLM715	Northern Michigan, MI
Michigan NPSPAC Region 21	BEA061	WPLM724	Traverse City, MI
Louisiana NPSPAC Region 18	BEA083	WPLM782	New Orleans, LA-MS
Louisiana NPSPAC Region 18	BEA083	WPOI361	New Orleans, LA-MS
Louisiana NPSPAC Region 18	BEA084	WPLM785	Baton Rouge, LA-MS
Louisiana NPSPAC Region 18	BEA085	WPLM788	Lafayette, LA
Louisiana NPSPAC Region 18	BEA085	WPOI302	Lafayette, LA
Louisiana NPSPAC Region 18	BEA086	WPLM791	Lake Charles, LA
Louisiana NPSPAC Region 18	BEA088	WPOI305	Shreveport-Bossier City, LA-AR
Louisiana NPSPAC Region 18	BEA089	WPLM800	Monroe, LA
Mississippi NPSPAC Region 23	BEA082	WPLM779	Biloxi-Gulfport-Pascagoula, MS
Mississippi NPSPAC Region 23	BEA076	WPLM766	Greenville, MS
Mississippi NPSPAC Region 23	BEA076	WPOI387	Greenville, MS