



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

July 9, 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 Idaho, Wyoming, Montana, North Dakota, South Dakota, Nebraska, Kansas, Arkansas, Oklahoma and Texas – Lubbock, Texas – Austin, Texas – Dallas, and Texas - Houston.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

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.

MHz. The FCC Letter updated three of Sprint Nextel's EA licenses in the Colorado NPSPAC 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. 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. On June 12, 2008, Sprint Nextel filed a request to update its EA licenses in Hawaii, Alaska, Missouri, Utah, Iowa, Kentucky, Tennessee, Michigan, Louisiana and Mississippi NPSPAC Regions. On July 3, 2008, Sprint Nextel filed a request to update its EA licenses in the Eastern Pennsylvania (Region 28), North Carolina, South Carolina, Virginia, West Virginia, Oregon, Washington, DC area (Region 20) and Upstate New York (Region 30) NPSPAC regions.

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

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

Idaho NPSPAC Region 12	BEA147	WPOH353	Spokane, WA-ID
Idaho NPSPAC Region 12	BEA148	WPOI372	Idaho Falls, ID-WY
Idaho NPSPAC Region 12	BEA149	WPOH357	Twin Falls, ID
Idaho NPSPAC Region 12	BEA149	WPOI313	Twin Falls, ID
Idaho NPSPAC Region 12	BEA150	WPOH358	Boise City, ID-OR
Idaho NPSPAC Region 12	BEA150	WPOI314	Boise City, ID-OR
Idaho NPSPAC Region 12	BEA150	WPQT207	Boise City, ID-OR
Wyoming NPSPAC Region 46	BEA142	WPOH342	Scottsbluff, NE-WY
Montana NPSPAC Region 25	BEA144	WPOH346	Billings, MT-WY
Montana NPSPAC Region 25	BEA145	WPOH348	Great Falls, MT
Montana NPSPAC Region 25	BEA146	WPOH350	Missoula, MT
North Dakota NPSPAC Region 32	BEA111	WPOH259	Minot, ND
North Dakota NPSPAC Region 32	BEA112	WPOH261	Bismarck, ND-MT-SD
South Dakota NPSPAC Region 38	BEA114	WPOH265	Aberdeen, SD
South Dakota NPSPAC Region 38	BEA115	WPOH268	Rapid City, SD-MT-ND-NE
Nebraska NPSPAC Region 26	BEA119	WPOH280	Lincoln, NE
Nebraska NPSPAC Region 26	BEA120	WPOH283	Grand Island, NE
Nebraska NPSPAC Region 26	BEA121	WPOH285	North Platte, NE-CO
Nebraska NPSPAC Region 26	BEA121	WPQS995	North Platte, NE-CO
Nebraska NPSPAC Region 26	BEA141	WPQS993	Denver-Boulder-Greeley, CO-KS-NE
Kansas NPSPAC Region 16	BEA122	WPOH288	Wichita, KS-OK
Kansas NPSPAC Region 16	BEA122	WPQT234	Wichita, KS-OK
Kansas NPSPAC Region 16	BEA123	WPOH291	Topeka, KS
Arkansas NPSPAC Region 4	BEA090	WPOH202	Little Rock-North Little Rock, AR
Arkansas NPSPAC Region 4	BEA091	WPOH204	Fort Smith, AR-OK
Oklahoma NPSPAC Region 34	BEA124	WPOH294	Tulsa, OK-KS
Oklahoma NPSPAC Region 34	BEA125	WPOH297	Oklahoma City, OK
Oklahoma NPSPAC Region 34	BEA126	WPOH299	Western Oklahoma, OK
Dallas Texas NPSPAC Region 40	BEA127	WPOH302	Dallas-Fort Worth, TX-AR-OK
Dallas Texas NPSPAC Region 40	BEA127	WPOI411	Dallas-Fort Worth, TX-AR-OK
Austin Texas NPSPAC Region 49	BEA130	WPOH309	Austin-San Marcos, TX
Austin Texas NPSPAC Region 49	BEA130	WPOI367	Austin-San Marcos, TX
Austin Texas NPSPAC Region 49	BEA130	WPQT238	Austin-San Marcos, TX
Houston Texas NPSPAC Region 51	BEA087	WPLM794	Beaumont-Port Arthur, TX
Houston Texas NPSPAC Region 51	BEA131	WPOH312	Houston-Galveston-Brazoria, TX
Houston Texas NPSPAC Region 51	BEA131	WPOI370	Houston-Galveston-Brazoria, TX
Lubbock Texas NPSPAC Region 52	BEA137	WPOH329	Lubbock, TX
Lubbock Texas NPSPAC Region 52	BEA138	WPOH331	Amarillo, TX-NM
Lubbock Texas NPSPAC Region 52	BEA138	WPQT231	Amarillo, TX-NM