

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of: )  
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In the Matter of: ) RM-11527  
Petition for Rulemaking to Amend )  
The Land Mobile-TV Sharing Rules )  
On the 470-512 MHz Bands )  
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**COMMENTS OF THE TELECOMMUNICATIONS INDUSTRY ASSOCIATION**

The Telecommunications Industry Association (TIA) hereby submits comments to the Federal Communications Commission (Commission) in the above-captioned proceeding.<sup>1</sup> TIA strongly supports the petition of the National Public Safety Telecommunications Council (NPSTC) to amend the Commission’s rules regarding land mobile/television channel sharing in the 470-512 MHz band, and urges adoption of NPSTC’s recommendations included therein.<sup>2</sup>

The Telecommunications Industry Association (TIA) represents the global information and communications technology (ICT) industry through standards development, advocacy, tradeshow, business opportunities, market intelligence and world-wide environmental regulatory analysis. TIA enhances the business environment

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<sup>1</sup> Public Notice, Report No. 2887, Petition for Rulemaking to Amend the Land Mobile-TV Sharing Rules in the 470-512 MHz Band, RM-11527 (CGB Apr. 7, 2009).

<sup>2</sup> National Public Safety Telecommunications Council, Petition for Rulemaking to Amend the Land Mobile-TV Sharing Rules in the 470-512 MHz Band, RM-11527 (filed Feb. 13, 2009) (NPSTC Petition).

for broadband, mobile wireless, information technology, networks, cable, satellite and unified communications. Members' products and services empower communications in every industry and market, including healthcare, education, security, public safety, transportation, government, the military, the environment and entertainment. TIA is accredited by the American National Standards Institute (ANSI).

In TIA's Wireless Communications Division's Private Radio Section (PRS), TIA members address key standards and policy issues concerning two-way radio systems utilized by public safety and industrial, transportation, and governmental sectors. In significant part, TIA's PRS focuses on the necessary requirements for supporting reliable wireless communications responding to the needs of the public safety users of the Commission's land mobile radio spectrum. Accordingly, TIA's PRS addresses issues relating to land mobile/television channel sharing. Based upon the expertise of TIA's PRS members, TIA fully supports the NPSTC Petition.

## **II. DISCUSSION**

Subpart L of Part 90 of the Commission rules governs the authorization and use of frequencies by land mobile stations in the band 470–512 MHz on a geographically-shared basis with television broadcast stations.<sup>3</sup> Under this sharing plan, different frequencies are allocated depending on the geographic urban area involved.<sup>4</sup> In allowing land mobile/television sharing, the Commission has provided public safety with a vital tool to conduct mission-critical operations in eleven major urban areas. However, technological

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<sup>3</sup> See 47 C.F.R. § 90.301 et. seq.

<sup>4</sup> See *id.*

advancements compel revisions to the Commission's land mobile/television sharing rules. Additionally, with the June 12, 2009 transition from analog television to DTV, the Commission has the opportunity to provide greater flexibility in land mobile/television sharing. The NPSTC Petition proposes effective rule changes to reflect the significant advancement of television broadcast technology in recent past. The NPSTC Petition requests that the Commission amended its rules to increase the mobile/television channel sharing area of licensing from 50 miles to 80 miles. The Petition also recommends changes to the technical rules for interference protection to and from TV stations to reflect digital television (DTV) operations. Given the fact that DTV receivers are less susceptible to interference than analog receivers, NPSTC's recommendations will not harm television viewing. The result of such modifications will provide significant benefits to public safety and other land mobile users and allow more efficient use of a scarce spectrum resource.

### **III. CONCLUSION**

For the foregoing reasons, TIA urges the Commission to adopt the recommendations included in the NPSTC Petition.

Respectfully submitted,

TELECOMMUNICATIONS  
INDUSTRY ASSOCIATION

By:  /s/ \_\_\_\_\_

Danielle Coffey  
Vice President,  
Government Affairs

Patrick Sullivan  
Director, Technical and Government  
Affairs

TELECOMMUNICATIONS  
INDUSTRY ASSOCIATION  
10 G Street N.E.  
Suite 550  
Washington, D.C. 20002  
(202) 346-3240

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