

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

In the Matter of )  
 )  
Petition by Enterprise Wireless Alliance ) RM-11572  
Requesting the Creation of New, Full Power, )  
Interstitial 12.5 kHz Channels in the 800 MHz Band )

**COMMENTS OF THE  
LAND MOBILE COMMUNICATIONS COUNCIL**

The Land Mobile Communications Council (LMCC), pursuant to Section 1.415 of the Commission’s Rules, 47 C.F.R. § 1.1415, hereby respectfully submits its Comments in the above-captioned proceeding. LMCC supports the Petition for Rulemaking by Enterprise Wireless Alliance (EWA) and proposes an LMCC initiative to address frequency coordination and protection requirements that must be resolved to successfully implement the EWA proposal while protecting incumbent licensees.<sup>1</sup> LMCC urges the Commission to expedite the release of a Notice of Proposed Rulemaking (NPRM) that endorses the EWA proposals recommended in their Petition.

**I. INTRODUCTION**

LMCC is a non-profit association of organizations representing virtually all users of land mobile radio systems, providers of land mobile services, and manufacturers of land mobile radio equipment. LMCC acts with the consensus, and on behalf, of the vast majority of public safety, business, industrial, transportation and private commercial radio users, as well as a diversity of

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<sup>1</sup> The Utilities Telecom Council (UTC) does not join LMCC in supporting these Comments and will file separate Comments.

land mobile service providers and equipment manufacturers. Membership includes the following organizations:

- American Association of State Highway and Transportation Officials (AASHTO)
- American Automobile Association (AAA)
- American Petroleum Institute (API)
- Association of American Railroads (AAR)
- Association of Fish and Wildlife Agencies (AFWA)
- Association of Public-Safety Communications Officials-International, Inc. (APCO)
- Aviation Spectrum Resources, Inc. (ASRI)
- Central Station Alarm Association (CSAA)
- Enterprise Wireless Alliance (EWA)
- Forest Industries Telecommunications (FIT)
- Forestry-Conservation Communications Association (FCCA)
- Intelligent Transportation Society of America, Inc. (ITSA)
- International Association of Fire Chiefs (IAFC)
- International Municipal Signal Association (IMSA)
- MRFAC, Inc. (MRFAC)
- National Association of State Foresters (NASF)
- PCIA – The Wireless Infrastructure Association (PCIA)
- Telecommunications Industry Association (TIA)
- Utilities Telecom Council (UTC)

## **II. COMMENTS**

LMCC and its members have long been advocates of more efficient use of spectrum and the need for additional spectral capacity for all private Land Mobile Radio (LMR) service users, including public safety, business and enterprise users. We agree with EWA that, similar to the creation of interstitial channels in the VHF and UHF bands through the Commission's narrowbanding proceeding, the creation of new 12.5 kHz interstitial channels in the 800 MHz (809-816 MHz and 854-861 MHz) band will promote greater spectral efficiency and also lead to the deployment of advanced technologies similar to those being deployed in the VHF and UHF bands. A variety of advanced analog and digital LMR equipment, using FDMA and new TDMA techniques, is being provided in the 800 MHz band by the equipment vendors today.

The availability of new additional 12.5 kHz channels in the 800 MHz band will provide additional opportunities to better meet the communications needs and accelerate the advanced equipment choices of the users. As noted by EWA, unlike the shared and cluttered spectrum environment in the VHF and UHF bands, the structured virtually exclusive channel use through protected service contours in the 800 MHz band much more readily allows the introduction of new trunking systems and licensing of usable interstitial 12.5 kHz channels, both of which lead to more efficient use of the spectrum and more frequency channel availability for users.

LMCC reiterates that EWA is not proposing a narrowbanding mandate nor deadline whereby licensees of existing 25 kHz channels must migrate to 12.5 kHz efficiency. The 800 MHz band is currently in a multi-year rebanding program which is causing significant disruption to many incumbent licensees that are required to relocate their LMR communications to other parts of the band. As discussed below and in the EWA Petition, existing 800 MHz systems would not require further relocation, modification or reprogramming with the introduction of interstitial 12.5 kHz channels.

Our membership includes all of the FCC-certified Frequency Advisory Committees and as such we want to ensure that new 12.5 kHz operations licensed on the interstitial channels, which can be either analog or digital technology, do not cause interference to or receive interference from incumbent and mostly analog 25 kHz operations, as is the intent of the EWA Petition. We propose that, under the auspices of the LMCC, our FAC members have the opportunity to further study frequency coordination requirements proposed by EWA, consider alternative methods of contour analyses, and collectively develop a set of coordination procedures that we will recommend to the Commission as part of this proceeding. This is similar to previous LMCC programs to adopt frequency coordination procedures, the latest of which are the LMCC

recommended coordination procedures to accommodate new narrowband technology in the VHF and UHF LMR spectrum bands.<sup>2</sup>

In conclusion, LMCC urges the Commission to expeditiously issue an NPRM that endorses the EWA proposals recommended in their Petition. We further urge the Commission not to delay release of the NPRM for the completion of the above LMCC coordination recommendations. LMCC will study the frequency coordination requirements and develop a consensus FAC recommendation simultaneous to the Commission initiating the rulemaking proceeding.

Respectfully submitted,

By: /s/ Al Ittner

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<sup>2</sup> LMCC letter to Scot Stone, Deputy Chief of Mobility Division, re: Frequency Coordination Procedures for 6.25 kHz Bandwidth Equipment, dated August 4, 2008