

Comments concerning proposed modifications to the 90.187 Trunking in bands between 150 and 512 MHz:

The FCC should strive to favor the licensing of narrowband and very narrowband channels over wideband channels for both FB8 and conventional operation. There are a number of unique reasons that the FCC should reject the proposed modification of the rules to broaden the definition of "adjacent" channels:

1. If the proposed rules are adopted what are now non-adjacent wideband channels will be considered adjacent; the result will be to almost ensure in a large part of the country, no narrow or very narrowband channels will be licensed at least until 2013 for narrowband and even past that date for very narrowband.

2. Contrary to the desired intent many licensees did not release VHF and UHF channels when agencies that once used these channels moved to the 800 MHz band. Rather they transferred the use of these channels to other agencies within their jurisdiction. The large majority of such licenses are licensed for wideband operation. The impact on surrounding and often smaller locales is that they are often not able to license sufficient channels to deploy, expand, or upgrade to trunking. The proposed rules would make this already difficult situation even more challenging.

Utilizing the proposed rules a neighboring locale would have to consider these wideband channels when attempting to license a narrowband channel and in many situations not be successful. Such a locale suffers from two hardships: the first being the hoarding of the original frequency or channel and the second the inability to license a narrowband channel because of the neighboring wideband channel. The problem is compounded by an original wideband channel that is often being operated in a narrowband mode.

In other words the FAC (Frequency Advisory Committees) must evaluate the potential "adjacent" channels based on their wideband designation even though, over time, the licensee has added a narrowband emissions designator and is in fact operating narrowband equipment but has not removed the wideband designation.