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FCC Mail Room

March 21, 2011

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: In the Matter of Liberty Communications, Inc. and Sprint Nextel Corporation, WT Docket No. 02-55

Dear Ms. Dortch:

On behalf of Bird Technologies Group ("BTG"), I am writing to clarify certain of our findings in the above-referenced matter.

Beginning on August 11, 2008, BTG was involved in a field investigation of the Liberty Communication, Inc. 800 MHz Specialized Mobile Radio (SMR) system in and around Tallahassee, Florida. The Liberty system operates seven (7) sites in Northern Florida, with the investigation focused on the Central Tower site in Tallahassee and the East Point site near Apalachicola, Florida. The sites had been "re-banded", had received replacement channel frequencies, under the Nextel 800 MHz re-banding program. The field investigation was conducted by Alfred T. Yerger, a BTG employee and RF Engineering Specialist with many years of experience in interference mitigation.

During our field investigation of the Liberty system, we found that five (5) of the re-banded channels provided by Nextel were not comparable to those previously held by Liberty because they were too closely spaced to allow the system to operate effectively. More specifically, the use of adjacent channels within the same system and site resulted in harmful interference within the Liberty Communications 800 MHz SMR system, which could have been avoided through the issuance of channels spaced further apart.

These findings were discussed in our report of August 26, 2008. However, it has come to our attention that there may be some uncertainty as to whether we detected actual interference into Liberty's operations as a result of the close-spacing discussed above. Accordingly, we are writing to clarify that we did detect such interference, and that this interference was sufficient to preclude the effective operation of Liberty's system. Indeed, based on our extensive experience, we



believe that this close spacing is the primary obstacle to the effective operation of Liberty's system.

Regards,

Donald E. Huston

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