

September 29, 2011

Via Electronic Mail

Rick Kaplan
Bureau Chief, Wireless Telecommunications Bureau
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

Re: Harmful interference between 150 and 512 MHz

Dear Mr. Kaplan:

This letter is a follow-up to our inquiry on behalf of Icom America, Inc. ("Icom") on August 18, 2011. Icom requested clarification of the Commission's regulations regarding trunking in the 150-512 MHz bands, specifically 47 C.F.R. §90.187(b). That regulation states, "Trunked systems operating under this section must employ equipment that prevents transmission on a trunked frequency if a signal from another system is present on that frequency. The level of monitoring must be sufficient to avoid causing harmful interference to other systems."

The following represents additional information regarding the 250 millisecond data burst from the control channel idle message discussed in the August 18, 2011 letter:

1. The data burst occurs every 5 seconds during idle time, although it can be programmed by the system administrator to occur in the range of 3 – 10 seconds;
2. The power output of the data burst is the same as the main transmitting signal;
3. Additional information – Each frame is 80 ms. The "collect channel"¹ sends 6 frames, while the "home channel" sends 4 frames.² The frames include the

¹ A "collect channel" in this instance is a channel that sends out a pulse for the roaming function.

² A "home channel" in this instance acts in a manner similar to a home channel in a traditional trunked LTR system.

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Federal Communications Commission
Office of the Secretary

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site code, site overlap, and adjacent site information.

If you require any additional information, please contact the undersigned.

Sincerely yours,

Alan S. Tilles, Esquire
Counsel to Icom America, Inc.

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