



LAND MOBILE COMMUNICATIONS COUNCIL

September 14, 2012

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: WP Docket No. 07-100
WT Docket No. 99-87

Ex Parte presentation

Dear Ms. Dortch:

On September 12, 2012, Douglas M. Aiken, Alfred R. Ittner, Mark E. Crosby, Ralph A. Haller, Donald Vasek, and Farokh Latif (via telephone), the members of the Land Mobile Communications Council (“LMCC”) Board of Directors (“Board”), met with the staff of the Public Safety and Homeland Security Bureau (“PSHSB”) and the Wireless Telecommunications Bureau (“WTB”) listed below. The parties discussed the following FCC proceedings:

WP Docket No. 07-100: The parties discussed the status of this proceeding, in particular the LMCC’s proposed changes to FCC Rule Section 90.187. They also discussed the Adjacent Channel Contour Values (“ACCV”) table filed by the LMCC on June 14, 2012.¹ The ACCV table will be used by the FCC’s Public Safety and Industrial/Business certified frequency advisory committees to identify incumbent licenses that will be recognized as affected parties for purposes of certifying applications for exclusive use channels in centralized and hybrid trunked radio communication systems pursuant to FCC Rule Section 90.187. The FCC staff requested clarification of the ACCV table in three areas. The LMCC clarification is attached hereto.

WT Docket No. 99-87: The parties discussed the industry’s progress in meeting the January 1, 2013 requirement to narrowband Part 90 systems operating on frequencies in the 150-174 MHz and 421-512 MHz bands and the FCC’s post-deadline enforcement plans. The LMCC Board repeated the LMCC’s intention, effective February 1, 2013, not to consider for purposes of frequency coordination under FCC Rule Section 90.187 and other applicable FCC rules any system

¹ See Letter dated June 14, 2012, from Douglas M. Aiken, President, Land Mobile Communications Council, which submitted the ACCV table.

whose authorization does not reflect compliance with the narrowbanding requirement and as to which there is no pending request seeking a waiver of that requirement.²

This letter is being filed electronically, in accordance with Section 1.1206(b) of the Commission's Rules, 47 C.F.R. § 1.1206(b), for inclusion in the record in these proceedings.

Respectfully submitted,

[Douglas M. Aiken](#)

President

Attachment

cc: Michael Wilhelm, PSHSB
Brian Marengo, PSHSB
Tracy Simmons, PSHSB (via telephone)
Scot Stone, WTB
Tom Eng, PSHSB
Rodney Conway, WTB
Melvin Spann, WTB
Terry Fishel (via telephone)

² See Letter dated May 21, 2012, from Douglas M. Aiken, President, Land Mobile Communications Council, to David Furth, Acting Chief, PSHSB, and Rick Kaplan, Chief, WTB.

Adjacent Channel Contour Values (“ACCV”) Table
Land Mobile Communications Council
Clarifications in Response to the
Federal Communications Commission

During the Tuesday, September 12, 2012, meeting between FCC and LMCC representatives, several requests for clarification were requested by the FCC. This statement provides the LMCC’s response to those questions.

First, a question was raised about why the derating factors are not linear. The short answer is that not all emission types have the same spectrum signature. Specifically, the 7k emissions are digital TDMA signals, which tend to occupy the entire authorized bandwidth. The 8k emissions are P25 Phase One and the power tends to be concentrated in the center of the authorized bandwidth, thus having less effect on adjacent channels. Simply stated, 7k emissions have a greater adjacent channel interference potential than 8k emissions. This explains why the adjacent channel contour values in the tables result in a lesser interference radius for 8k signals versus 7k signals.

A second question was asked regarding values in the second chart under 7.5 kHz channel separation for incumbent 7k and 8k emissions. The chart shows 82 dBuV/m for 7 k emissions and “NR” (not required) for 8k emissions. In reality, the 82 for 7k could probably also be “NR.” At some point, the interference radius becomes so small that it need not be considered. In this case, however, the choice was made to show the value of 82 dBuV/m to prevent a TDMA transmitter from being inside the service contour of an incumbent adjacent channel station. It was not felt necessary to do the same for a P25 Phase One transmitter.

Finally, the question of treatment of low power TETRA (20ko bandwidth) was discussed. The 22 kHz bandwidth values in the table would be used for low power TETRA at this time. We have no data regarding the adjacent channel effects of low power TETRA. While using the 22 kHz values may be slightly conservative, we feel that they are adequate for coordination purposes, at least until we have more data about low power TETRA.