LAND MOBILE COMMUNICATIONS COUNCIL

November 9, 2012

David S. Turetsky, Chief
Public Safety and Homeland Security Bureau
Federal Communications Commission
445 12th Street, N.W.
Washington, D.C. 20554

Ruth Milkman, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, N.W.
Washington, D.C. 20554

Re: WT Docket No. 99-87
Late-Filed Narrowbanding Applications

Ex Parte Presentation

Dear Mr. Turetsky and Ms. Milkman:

During its November 8, 2012, meeting, the LMCC membership, which includes all FCC-certified frequency advisory committees, discussed the anticipated increase in volume of applications from licensees who seek to modify their licensees to demonstrate compliance with the Part 90 narrowbanding mandate. Given the potential for a significant number of such applications being submitted to the frequency advisory committees between now and December 31, 2012, it may not be possible for the coordinators to review for accuracy and electronically file all narrowband applications with the FCC on or before December 31, 2012. Therefore, as a means to accommodate these licensees, the LMCC membership has unanimously agreed to the following process for which FCC approval is requested.

All frequency advisory committees will prepare a list of call signs for which an application has been received requesting modification to comply with narrowbanding rules which applications cannot be electronically submitted on or before December 31, 2012. These lists will be submitted electronically to the FCC and to all other frequency advisory committees no later than January 3, 2013, for the purpose of identifying these call signs as narrowbanding compliant. Given current resources, it is the LMCC's belief that this process supports narrowbanding objectives and reasonably accommodates licensees that, although perhaps late with their application submittals, presumptively will have narrowbanding-compliant equipment in place by the January 1, 2013 deadline.

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 this proceeding.

Should you have any questions or comments regarding this matter, please contact me. We would also be pleased to meet with the Bureaus, if necessary, to discuss and refine this LMCC recommendation. We look forward to hearing from you.

Sincerely,

Douglas M. Aiken

President

DMA:

cc: FCC Secretary
LMCC Membership
David Furth
Roger Noel