



February 18, 2014

Roger Noel, Chief
Mobility Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

David Furth, Deputy Chief
Public Safety and Homeland Security Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Update of Sprint's 800 MHz Licenses to Include 866-869 MHz
WT Docket 02-55

Dear Mr. Noel and Mr. Furth:

In accordance with your letter of May 6, 2008 ("FCC Letter"), Sprint Corporation ("Sprint") hereby requests that the Federal Communications Commission ("Commission") update its licensing database and reissue the attached list of Sprint's 800 MHz Economic Area ("EA") licenses to specify, as provided in the Commission's orders in this proceeding, Sprint's right to operate in the 821-824 MHz/866-869 MHz band in the National Public Safety Advisory Committee ("NPSPAC") Region of Puerto Rico/U.S. Virgin Islands and the U.S Territories of Guam and American Samoa/Northern Mariana Islands.¹

800 MHz band reconfiguration entails the retuning of public safety 800 MHz systems from the "old NPSPAC band" at 821-824 MHz/866-869 MHz (hereafter "old NPSPAC band") to new channel assignments at 806-809 MHz/851-854 MHz (the "new NPSPAC band"). The FCC Letter established a process for Sprint to update its EA licenses during 800 MHz band reconfiguration to provide Sprint its 800 MHz replacement spectrum subject to a series of conditions.²

¹ Sprint requests that the Commission update specific Sprint EA authorizations to add authority to operate on various segments within the ESMR band at 817-824/862-869 MHz. Each identified call sign currently covers a unique geography in the relevant NPSPAC Region or U.S Territory and currently authorizes geographic-wide operations on a portion of the 806-821/851-866 MHz band and needs to be modified to reflect the correct post-rebanding ESMR band spectrum position for Sprint in that EA.

² On May 23, 2008, Sprint Nextel filed a request to update its EA licenses in the Minnesota, Northern California, New England, Chicago and Florida NPSPAC regions. On June 3, 2008, Sprint Nextel filed a request to update its EA licenses in the New York (Region 8), Nevada, Wisconsin, Indiana, Illinois, Alabama and Georgia NPSPAC Regions. On June 12, 2008, Sprint Nextel filed a request to update its EA licenses in Hawaii, Alaska, Missouri, Utah,

All 800 MHz band reconfiguration retunes are complete in the U.S. Territories of Guam and American Samoa/Northern Mariana Islands.³ Sprint has also completed the public safety retunes from the old NPSPAC band in the Puerto Rico/U.S. Virgin Islands NPSPAC Region. Accordingly, Sprint hereby requests that the Commission modify the attached list of EA licenses to add the “old NPSPAC band” and other ESMR band spectrum as necessary to replace those 800 MHz channels Sprint has provided public safety incumbents retuning to the new NPSPAC band in the above-referenced NPSPAC regions and U.S. Territories.

Sprint recognizes its responsibility to avoid contributing to new commercial mobile radio service (“CMRS”) – public safety interference by its use of the 821-824/866-869 MHz band channels. In accordance with the FCC Letter of May 6, 2008, Sprint hereby agrees to accept the following conditions on its updated EA licenses:

1. Sprint will provide appropriate co-channels protection to incumbent licensees pursuant to Section 90.621(b) of the Commission’s co-channel protection rules.
2. Sprint will provide adjacent-channel protection in accordance with the standards adopted by the Commission in the *Second Memorandum Opinion and Order* based on the petition filed by NPSPAC Region 8 (New York Metropolitan Area).
3. Sprint will not use and will protect the five nationwide mutual aid channels in the 821-824/866-869 MHz band in each NPSPAC region in which it operates until rebanding is complete in that region.
4. At least 30 days prior to initiating service in the 821-824/866-869 MHz band pursuant to its modified EA licenses, Sprint must provide written notification to every NPSPAC licensee in the affected NPSPAC Region(s), at the contact address listed in the ULS, that it intends to use its modified licenses to operate in the 821-824/866-869 MHz band.⁴ In addition, Sprint must provide the

Iowa, Kentucky, Tennessee, Michigan, Louisiana and Mississippi NPSPAC Regions. On July 3, 2008, Sprint Nextel filed a request to update its EA licenses in the Eastern Pennsylvania (Region 28), North Carolina, South Carolina, Virginia, West Virginia, Oregon, Washington, DC area (Region 20) and Upstate New York (Region 30) NPSPAC regions. On July 9, 2008, Sprint Nextel filed a request to update its EA licenses in Idaho, Wyoming, Montana, North Dakota, South Dakota, Nebraska, Kansas, Arkansas, Oklahoma and Texas – Lubbock, Texas – Austin, Texas – Dallas, and Texas – Houston. On September 15, 2008, Sprint Nextel filed a request to update its EA licenses in Washington, Western New York, Western Pennsylvania, Ohio and New Mexico. On February 14, 2014, Sprint filed a request to update its EA licenses in Southern California, Arizona, Texas – El Paso, and Texas – San Antonio.

³ See Sprint 800 MHz Progress Report, dated February 3, 2014, filed in WT Docket 02-55.

⁴ Sprint will similarly notify NPSPAC licensees in adjacent regions whose facilities are within 70 miles of Sprint’s proposed EA operations.

same written notification to the Regional Planning Coordinator(s) for the affected NPSPAC region(s).

5. Sprint will update the administrator of the CTIA interference website of any new geographic areas in which Sprint deploys facilities in the 821-824/866-869 MHz band.
6. In the event of an interference complaint, Sprint will strictly adhere to the Commission's mandated response timelines and requirements specified in Section 90.674 of the Commission's Rules.
7. Until conclusion of band reconfiguration in the affected NPSPAC region(s), Sprint will protect public safety systems in the 821-824/866-869 MHz band in accordance with the "interim" interference standard specified by the Commission in the 800 MHz Supplemental Order. In addition, Sprint will employ the additional protection methods identified in the Supplemental Order to protect public safety systems in the 821-824/866-869 MHz band that do not meet the signal strength threshold under Commission's interim rules but that do meet the threshold under the Commission's final interference rules.

Sprint respectfully requests expedited treatment of this request in order to facilitate 800 MHz band reconfiguration. Should you have any further questions in this matter, please contact the undersigned.

Respectfully submitted

/s/

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cc: Terry Fishel, Mobility Division
800 MHz Transition Administrator

Roger Noel, Chief

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List of EA Licenses to be Updated Within Associated NPSPAC Region(s)

EA Name	EA #	Current Block	Call Sign	Addition
Guam and Northern Mariana Islands	BEA173	F	WPRQ631	Add partial X Block (866.375 - 869.0 MHz)
Puerto Rico and Virgin Islands	BEA174	B	WQNV988	Add partial C Block (864.75 - 866.0 MHz) and add X Block (866.0 - 869.0 MHz)
American Samoa	BEA175	F	WPRQ632	Add B Block (862.0 - 863.0 MHz)
American Samoa	BEA175	FF	WPRQ761	Add C (863.0-866.0 MHz) and X Block (866.0 - 869.0 MHz)