



May 27, 2014

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

Re: Land Mobile Communications Council Petition for Rulemaking Regarding Interim Eligibility for 800 MHz Expansion Band and Guard Band Frequencies RM-11719

Dear Ms. Dortch,

The Telecommunications Industry Association (“TIA”)¹ writes to express its support for Land Mobile Communications Council’s Petition for Rulemaking Regarding Interim Eligibility for 800 MHz Expansion Band and Guard Band Frequencies.²

As noted in the Public Notice, the Land Mobile Communications Council (LMCC) on March 27, 2014 filed a petition for rulemaking asking the Commission to modify Section 90.617 of the Commission’s rules governing eligibility for frequencies in the 800 MHz Expansion Band (EB) and Guard Band (GB) to allow 800 MHz incumbent licensees in a market a six-month period in which to apply for EB/GB frequencies before making them available to applicants for new 800 MHz systems.³ TIA is one of 19 LMCC member organizations, collectively representing virtually all users of land mobile radio systems, providers of land mobile services and manufacturers of land mobile radio equipment.

As a LMCC member, TIA supported its initial petition. TIA concurs with LMCC that the public interest would be served by allowing 800 MHz incumbents temporary priority for six months to apply for EB/GB frequencies.

¹ TIA is a Washington, DC-based trade association and American National Standards Institute (ANSI)-accredited standard developer that represent the global information and communications technology (“ICT”) manufacturer, vendor, and supplier community. TIA represents approximately 500 participating companies producing products and services empowering communications in every industry and market, including healthcare, education, security, public safety, transportation, government, the military, the environment, and entertainment. See <http://tiaonline.org/>.

² See FCC Wireless Telecommunications and Public Safety & Homeland Security Bureaus Seek Comment on Petition for Rulemaking by Land Mobile Communications Council Petition for Rulemaking Regarding Interim Eligibility for 800 MHz Expansion Band and Guard Band Frequencies, RM-11719 (rel. April 24, 2014), “PN”

³ See, Land Mobile Communications Council, Petition for Rulemaking Regarding Interim Eligibility for the 800 MHz Expansion Band (860-861/815-816 MHz) and Guard Band (861-862/816-817 MHz) (filed March 27, 2014) (Petition).

TIA is hesitant to comment on the question posed by the PN as to whether, pending resolution of the petition, the Bureaus should defer declaring rebanding to be complete in any additional NPSPAC regions. TIA does not know how long a freeze might be in place because we do not know how quickly the petition can be resolved. Consequently we are reluctant to encourage additional uncertainty.

TIA looks forward to continue working with the Commission on public safety communications.

Respectfully submitted,

**TELECOMMUNICATIONS INDUSTRY
ASSOCIATION**

By: */s/ Danielle Coffey*__

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