

Instructions for Filing Comments Against the LMCC Petition

1. Go to the following FCC “Electronic Comment Filing System” (ECFS) Express web site:

<http://apps.fcc.gov/ecfs/upload/display?z=enfrz>

- Under the block “Proceeding Number” insert **RM-11719**
- Complete the ADDRESS blocks
- Cut and Paste **one** of the following five comments into the box entitled “Type in or paste your brief comments.” **(Use you own words to modify as you see fit).**
- - LMCC argues that incumbent SMR 800 MHz operators are more deserving of 800 MHz Expansion Band/Guard Band frequencies. My firm is planning on using this spectrum to benefit the public with high quality data services. The LMCC Petition should be denied in the interest of fairness. Moreover, granting incumbents an exclusive 6 month window would effectively be a barrier to entry by new entrants.
 - LMCC fails to mention that the majority of its constituents and incumbent 800 MHz SMR operators failed to apply for 800 MHz Expansion Band/Guard Band frequencies in the early round and now they claim they are in dire need of more spectrum. They flat out missed the boat and did not care to apply but now they suddenly reverse course. Permitting such incumbents a 6 month window in which to apply for EB/GB spectrum prior to applications being accepted by equally deserving new entrants is not consistent with FCC objectives for competition in the market place as indicated throughout the Telecommunications Act

of 1996. I respectfully request that the Commission DENY the LMCC Petition.

- Allowing a 6 month window for existing 800 MHz operators to apply for EB/GB frequencies amounts to a barrier to entry for small businesses, veterans, minorities and others who view such frequencies as great American opportunity to offer emerging information technologies to commercial, consumer and government entities. For the foregoing reasons, the Commission should DENY the LMCC Petition.
- First responders, such as EMS, Rescue, Fire and Police already have spectrum. Under the Department of Homeland Security and the NTIA, the new First Responder Network (“FirstNet”), a 20 MHz wide band of frequencies, have been dedicated for the exclusive use of first responders using 700 MHz LTE technology which has been dubbed as more sophisticated than all existing first responder telecommunications technologies, e.g., 800 trunking, yet LMCC petitions for first priority status for 800 MHz. I am AGAINST the Petition of LMCC and recommend it be DENIED.
- LMCC contends that new entrants who file applications for 800 MHz Expansion Band/Guard Band frequencies will not construct and operator their systems. This is not true. I am a permit holder for 800 MHz EB/GB and am in the process of working with my engineerings, civil works and marketing resources to establish new my systems within the time limits set forth by the Federal Communications Commission. LMCC is distorting the facts and its assertions are speculative and unproven. For this reason, their Petition should be denied.

2. Press "Continue" at the bottom of the form.

DO NOTS:

- **Do NOT file your comments before Tuesday, 27 May. Ideally, file them before 2:00PM [Eastern Time.] (When you file comments too early, those that support the LMCC Petition will read your comments and reshape their comments in a way that will diminish the value of your comments. It is sort of like a war ... don't let the enemy know your hand until you are ready to strike.) Comments MUST be filed before 5:00PM [Eastern Time] on 27 May. If you file them afterwards, your comments will be rejected in this proceeding.**
 - **Do NOT insert any http or www website address.**
 - **Do NOT use profane words or statements.**
 - **Do NOT attempt to use macros or attach anything to the Express Comment form.**
 - **Do NOT attempt to use any fonts that are difficult to read.**
 - **Do NOT use any language other than English.**
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- For help from the FCC on ECFS filings, Phone: 202-418-0193

Thank you.

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