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I respectfully request the FCC immediately deny the petition of LMCC for the following reasons: 1. This is purely a self serving move on the part of the LMCC and its members to block new entities looking for opportunities to serve the public good (there is no policy precedence at the FCC that suggests that incumbency somehow gives one an advantage over other interested entities.) 2. It is widely acknowledged that the FCC has been overwhelmed by the request for additional frequencies by public safety entities (LMCC members) in the Interleaved; yet, here they come with an emergent request for additional spectrum in the Guard and Expansion Bands - spectrum specifically set aside for alternative purposes. On this basis alone the FCC should deny this petition.

For the foregoing reasons, the Commission should do the right thing and immediately dismiss the Petition.

Thank you.