

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of )  
 )  
Amendment of Part 90 ) WP Docket No. 07-100  
of the Commission's Rules )

To: The Commission

**REPLY COMMENTS  
OF THE  
LAND MOBILE COMMUNICATIONS COUNCIL**

Respectfully submitted,

LAND MOBILE COMMUNICATIONS COUNCIL  
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By: /s/ Ralph A. Haller

Ralph A. Haller  
President

September 11, 2007

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The Land Mobile Communications Council (“LMCC”), pursuant to Section 1.415 of the Federal Communication Commission (“FCC” or “Commission”) Rules and Regulations, 47 C.F.R. § 1.415, hereby respectfully submits its Reply Comments in the above-captioned proceeding.<sup>1</sup>

**I. INTRODUCTION**

LMCC is a non-profit association of organizations representing virtually all users of land mobile radio systems, providers of land mobile services, and manufacturers of land mobile radio equipment. LMCC acts with the consensus, and on behalf, of the vast majority of public safety, business, industrial, transportation and private commercial radio users, as well as a diversity of land mobile service providers and equipment manufacturers. Membership includes the following organizations:

- American Association of State Highway and Transportation Officials (AASHTO)
- American Automobile Association (AAA)
- American Petroleum Institute (API)
- Association of American Railroads (AAR)
- Association of Fish and Wildlife Agencies (AFWA)

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<sup>1</sup> *Notice of Proposed Rulemaking and Order*, WP Docket No. 07-100, 22 FCC Rcd 9595 (May 14, 2007) (“*NPRM*” or “*Notice*”).

- Association of Public-Safety Communications Officials-International, Inc. (APCO)
- Aviation Spectrum Resources, Inc. (ASRI)
- Central Station Alarm Association (CSAA)
- Enterprise Wireless Alliance (EWA)
- Forest Industries Telecommunications (FIT)
- Forestry-Conservation Communications Association (FCCA)
- Intelligent Transportation Society of America, Inc. (ITSA)
- International Association of Fire Chiefs (IAFC)
- International Municipal Signal Association (IMSA)
- MRFAC, Inc. (MRFAC)
- National Association of State Foresters (NASF)
- PCIA – The Wireless Infrastructure Association (PCIA)
- Telecommunications Industry Association (TIA)
- Utilities Telecom Council (UTC)

The individual members of these constituent organizations collectively represent a very significant portion of the FCC’s Part 90 licensees. Thus, LMCC and its members have a direct interest in the instant FCC proposal to amend certain Part 90 rules so as to facilitate new wireless technologies, devices and services, and to provide rules that are readily understood by the public.<sup>2</sup>

## **II. REPLY COMMENTS**

LMCC, in these reply comments, addresses some of the additional proposals for modification to Part 90 of the Commission’s rules provided by other commenters, which were not specifically raised in the NPRM. The NPRM did, however, request comment on other potential Part 90 rule changes.<sup>3</sup> In the following paragraphs, LMCC addresses some of these additional proposals.

**Station Identification.** Motorola, in its comments, suggested that the Commission review §90.425 of its rules regarding call signs and station identification for systems operating

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<sup>2</sup> *NPRM* at ¶ 2.

<sup>3</sup> *NPRM* at ¶ 1.

under Part 90.<sup>4</sup> In particular, Motorola suggested that the Commission 1) allow, in general, the transmission of the required station identification using digital signals instead of Morse code; and 2) allow private land mobile radio (PLMR) licensees operating multi-site networks to utilize a single call sign for the required station identification. LMCC supports both of these proposals as they would eliminate unnecessary burdens on licensees, while still ensuring that stations can still be identified.

With respect to the transmission of station identification using digital signals, LMCC notes that more and more digital systems are being implemented. As such, it makes sense to allow station identification to be made using digital signals for stations employing digital transmissions. This has already been implemented for the 800 MHz band<sup>5</sup> for systems with exclusive licenses, and proposed for the 700 MHz band.<sup>6</sup> Similar flexibility is justified for other PLMR frequency bands where the licensee has a protected service area or has been granted FB8 status. The necessary changes could be implemented through appropriate modifications to §90.425.

With respect to multi-site PLMR networks using a single call sign for station identification, LMCC notes that managing multiple call signs is a difficulty for large trunked systems. The Universal Licensing System (ULS) database only allows six sites per license, so the larger systems can end up with numerous call signs, also considering that there are separate licenses for each Radio Service code. Public Safety, for example, has separate Radio Service Codes for 700 MHz trunking, 800 MHz trunking, and NPSPAC trunking. It becomes

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<sup>4</sup> See Comments of Motorola on the NPRM, Pages 13-15.

<sup>5</sup> See §90.647.

<sup>6</sup> *Fifth Memorandum Opinion and Order, Sixth Report and Order, and Seventh Notice Of Proposed Rulemaking*, WT Docket No. 96-86, (January 7, 2007) at ¶ 41.

cumbersome to manage the broadcast of numerous call signs throughout the system. If the system as a whole broadcasts one call sign throughout, other entities can find the related call signs and licenses in ULS, through “associated” call signs. Looking up any of the associated call signs would lead to all call signs in the system. It should also be noted that §90.425(e)(2) allows CMRS stations to use a single call sign for commonly-owned facilities that are operated as part of a single system. Similar provisions for PLMR systems could be added to §90.425 to allow PLMR licensees the same flexibility as CMRS.

### **III. CONCLUSION**

LMCC is pleased to have this opportunity to provide reply comments on the Commission’s proposed revisions to Part 90 to assist the Commission in achieving effective and efficient use of the Part 90 spectrum.