



LAND MOBILE COMMUNICATIONS COUNCIL

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MEMBER

AAA

AAR January 14, 2008

AASHTO

AFWA

APCO Fred Campbell
Chief, Wireless Telecommunications Bureau
API Federal Communications Commission

ASRI 445 12th Street, SW

CSAA Washington, D.C. 20554

EWA

FCCA

FIT

IAFC

IMSA

ITSA

MRFAC

NASF

PCIA

TIA

UTC

Re: WT Docket No. 99-87; Pending Narrowband
Migration Public Notice

Dear Mr. Campbell:

In the Second Report & Order in WT Docket 99-87 the Commission established deadlines by which existing Part 90 licensees operating on frequencies between 150 MHz – 512 MHz must convert to technologies that either operate at 12.5 kHz occupied bandwidth or, if operating at a bandwidth greater than 12.5 kHz, must provide an equivalent efficiency of one voice path per 12.5 kHz of bandwidth occupied. In addition to the final narrowbanding deadline, the Commission established interim deadlines applicable to licensing new stations and modifying existing stations.

In the Third Memorandum and Order, Third Further Notice of Proposed Rulemaking in the same proceeding the Commission stated: “No later than December 31, 2009, the Wireless Telecommunications Bureau will issue a Public Notice reminding licensees and frequency coordinators of the impending January 1, 2011 deadline for filing new applications and modifications of any systems utilizing 25 kHz channels. The Public Notice will also serve as a reminder that all Public Safety Radio Pool and Industrial/Business Radio Pool licensees are required to migrate to 12.5 kHz technology by January 1, 2013.”

As you know, the Land Mobile Communications Council includes in its membership, all of the FCC-certified Frequency Advisory Committees (FACs). The FACs are collectively responsible for filing the overwhelming majority of applications that will be subject to the mandatory migration to narrowband operations. As such, LMCC has a keen interest in ensuring that the ongoing migration and the accompanying licensing process occur as smoothly as possible, and we take this opportunity to present the Bureau with a few ideas on facilitating said process.

Attached is a draft of a proposed Public Notice that not only reminds licensees of the impending deadlines, but also suggests a procedure requiring licensee action under which compliance with the narrowbanding requirement can be tracked. The suggested procedure will ensure an up-to-date database that accurately reflects the bandwidth status of all licensees, which is essential if FACs are to continue effectively managing the spectrum while the operating environment is undergoing constant change. It will also serve to assist the Commission in identifying those licensees that have not made the mandatory transition requirement, thus simplifying their disposition.

While the WTB's self-imposed deadline for issuing a narrowband Public Notice is nearly two years away, LMCC urges the Bureau to consider the issues to be addressed by the PN at its earliest opportunity. LMCC is pleased to serve as a resource to the Bureau as the migration process advances. We look forward to hearing from you regarding this matter and will be pleased to meet with Bureau officials at your convenience to discuss LMCC's proposal.

Sincerely,

A handwritten signature in cursive script that reads "Ralph A. Haller". The signature is written in dark ink and includes a small flourish at the end.

Ralph A. Haller
President

Attachment

cc: Mr. Derek Poarch