



LAND MOBILE COMMUNICATIONS COUNCIL

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Mr. Scot Stone
Deputy Chief, Mobility Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington D.C. 20554

Re: Frequency Coordination Procedures for 6.25 kHz
Bandwidth Equipment

Dear Mr. Stone:

The manufacturing community has introduced into the marketplace new equipment and technologies that operate at 6.25 kHz FDMA and 6.25 kHz TDMA equivalent efficiency. Integrating these new technologies within the existing VHF and UHF spectrum environment necessitated a review of the frequency analysis and certification processes performed by the FCC's certified frequency advisory committees (FACs). Under the auspices of the Land Mobile Communications Council (LMCC), collectively the FACs determined to address the new frequency coordination requirements necessary to effectively accommodate the deployment of the new narrowband technologies through several approaches.

First, LMCC filed comments in the FCC's rulemaking proceeding *Amendment of Part 90 of the Commission's Rules* (WP Docket No. 07-100) that propose changes to FCC Rule Sections 90.7 and 90.187, the rules that govern trunking operations below 512 MHz. LMCC believes its proposed changes are needed to ensure that new technology systems can operate in the heavily encumbered 150-174 and 450-512 MHz bands without compromising the operation of both incumbent and new systems. Until the rules have been updated that adapt to the introduction of new narrowband technologies, however, the FACs believe it is necessary to amend certain frequency coordination activities that concern the certification of exclusive-use FB8 channel assignments that will be used within centralized trunked system operations.

With the approval of the LMCC, the FACs have developed a set of coordination procedures that will serve to protect existing systems and concurrently provide opportunities for licensing new technology systems. LMCC takes this opportunity to advise the FCC that such procedures have been adopted and a copy is attached for your information. The procedures are consistent with, and essentially implement the proposals contained in LMCC's comments in WP Docket No. 07-100. All FACs have agreed to abide by the procedures.

In the past, when the LMCC has adopted frequency coordination procedures (e.g. - low power pool, 470-512 MHz refarming coordination), the FCC has issued a Public Notice to alert the industry as to the FACs consensus procedures. The LMCC suggests that the FCC continue that informative policy in this instance as well. LMCC would be pleased to discuss its coordination procedures with Commission staff at their convenience.

Sincerely,

/s/ Al Ittner

Al Ittner
President

ATTACHMENT

LMCC Frequency Coordination Consensus for 6.25 kHz Bandwidth or Equivalent Systems

- 1.) VHF systems will use a 13 dB derating of the interference contour for systems spaced at 7.5 kHz. The service contour is the 37 dBu f(50,50) contour and the interference contour is the 32 dBu f(50,10) contour.
- 2.) UHF systems will use an 8 dB derating of the interference contour for systems spaced at 6.25 kHz. The service contour is the 39 dBu f(50,50) contour and the interference contour is the 29 dBu f(50,10) contour.
- 3.) The derating factors will be reviewed in two years and increased by 3 dB unless harmful interference cases are documented during the two year period.
- 4.) The criteria will be used in both directions; i.e. - the interference contour of the proposed system may not overlap the service contour of the incumbent system and the interference contour of the incumbent system may not overlap the service contour of the proposed system.