



# LAND MOBILE COMMUNICATIONS COUNCIL

*Writer's Address and Telephone Number:*

8484 Westpark Drive  
Suite 630  
McLean, VA 22102

(703) 528-5115

## MEMBER

AAA

AAR

October 7, 2009

AASHTO

AFWA

Admiral Jamie Barnett  
Chief, Public Safety and Homeland Security Bureau

APCO

Federal Communications Commission

API

445 12<sup>th</sup> Street, SW

ASRI

Washington, DC 20554

CSAA

Ms. Ruth Milkman

EWA

Chief, Wireless Telecommunications Bureau

FCCA

Federal Communications Commission

FIT

445 12<sup>th</sup> Street, SW

IAFC

Washington, DC 20554

IMSA

Mr. Julius Knapp

ITSA

Chief, Office of Engineering and Technology

MRFAC

Federal Communications Commission

NASF

445 12<sup>th</sup> Street, SW

PCIA

Washington, DC 20554

TIA

UTC

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

Dear Mr. Knapp, Ms. Milkman and Admiral Barnett:

The Land Mobile Communications Council (LMCC) membership includes all of the FCC-certified Frequency Advisory Committees, who are collectively responsible for filing the overwhelming majority of applications that will be subject to the mandatory migration to narrowband operations in the VHF and UHF land mobile frequency bands. LMCC has expressed our collective interest throughout the narrowbanding proceedings to help ensure a smooth migration to more spectrally efficient technologies and the accompanying license process. This letter is to request that the Commission proceed quickly to issue a Public Notice alerting licensees of the upcoming narrowbanding deadlines.

In the Third Memorandum and Order, WT Docket No. 99-87, released December 23, 2004, the Commission stated that "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 Pool and Industrial/Business Radio Pool licensees are required to migrate to 12.5 kHz technology by January 1, 2013."

On January 14, 2008, LMCC first proposed our draft Public Notice that reminds licensees of the impending deadlines and also suggests FCC procedures that will help ensure affected licensees comply with these deadlines. Since then, we have been following up with the Commission to consider and issue the Public Notice as early as possible. Our efforts included a meeting on December 11, 2008, attended by leadership of LMCC, the Telecommunications Industry Association Private Radio Section (TIA-PRS), the National Public Safety Telecommunications Council (NPSTC), the Enterprise Wireless Alliance (EWA) and Mr. Julius Knapp and other members of the OET, PSHSB and WTB, to discuss a number of issues associated with the narrowbanding requirements that have been adopted affecting both licensees and the manufacturers of equipment to be used in the VHF and UHF bands. Based on the feedback received, LMCC revised and resubmitted our proposed Public Notice on February 27, 2009 to further simplify the FCC procedures and provide clarity to both licensees and frequency coordinators on meeting the narrowbanding deadlines. Note that we have made some additional modifications and clarifications on the attached Public Notice based on further developments since February.

As the 2011 and 2013 compliance deadlines are rapidly approaching, our members are receiving an increasing number of inquiries by licensees asking for clarifications on narrowbanding rules and implementation requirements. Even closer is the December 31, 2009 deadline noted in the Third Memorandum and Order whereby the Commission requires the PSHSB and WTB to issue this Public Notice.

We again urge the PSHSB and WTB to consider and quickly issue the attached revised Public Notice. LMCC is also requesting a meeting to review this critical issue directly with you and your staff in the next few weeks. Donald Vasek, our Secretary/Treasurer, will contact your offices to schedule a meeting with our Board so we can introduce ourselves and detail this and other important issues LMCC is currently looking to resolve with the Commission.

Sincerely,

  
Al Ittner  
President

Attachment

**PUBLIC NOTICE**  
**RELATED TO MANDATORY NARROWBANDING DEADLINES**  
**FOR CERTAIN PART 90 BANDS BETWEEN 150-512 MHz**

In the Third Memorandum Opinion and Order in WT Docket 99-87 the Commission established deadlines by which existing Part 90 licensees operating on frequencies between 150.8-162.0125 MHz, 173.2-173.4 MHz and/or 420 – 512 MHz must convert to technologies that either operate at 12.5 kHz channel 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 channel bandwidth, or provide a data rate of 4800 bps per 6.25 kHz of channel bandwidth. In addition to the final narrowbanding deadline, the Commission established interim deadlines applicable to licensing new stations and modifying existing stations.

This Public Notice reiterates and establishes a procedure requiring licensee action to ensure compliance with the applicable deadlines:

**January 1, 2011 – New Systems:** all applications to implement new systems on frequencies between 150.8-162.0125 MHz, 173.2-173.4 MHz and/or 420-512 MHz must employ technologies that either operate at 12.5 kHz (11.25 kHz occupied bandwidth), provide one voice path per 12.5 kHz of channel bandwidth, or provide a data rate of 4800 bps per 6.25 kHz of channel bandwidth.

**January 1, 2011 – Modifications to existing systems:** all applications seeking modifications to existing systems operating on frequencies between 150.8-162.0125 MHz, 173.2-173.4 MHz and/or 420-512 MHz that would increase the station's service area (37 dBu VHF/39 dBu UHF) must employ technologies that either operate at 12.5 kHz (11.25 kHz occupied bandwidth), employ a technology that provides one voice path per 12.5 kHz of channel bandwidth, or provides a data rate of 4800 bps per 6.25 kHz of channel bandwidth.

**January 1, 2013** – all incumbent Part 90 systems operating on frequencies between 150.8-162.0125 MHz, 173.2-173.4 MHz and/or 420-512 MHz must operate at 12.5 kHz (11.25 kHz occupied bandwidth), employ a technology that provides one voice path per 12.5 kHz of channel bandwidth, or provides a data rate of 4800 bps per 6.25 kHz of channel bandwidth.

Authorizations of incumbent licensees who fail to meet these deadlines will be considered to have cancelled automatically as of January 1, 2013. To ensure that all affected licensees comply with the listed narrowbanding compliance deadlines, the Commission is establishing the following procedures:

- To help ensure a smooth migration, the rules allow licensees to operate dual mode equipment at both 25 kHz and 12.5 kHz or greater efficiencies until the January 1, 2013 deadline. As of January 1, 2013, any licensees operating dual mode equipment must ensure that the 25 kHz efficiency mode is disabled. All equipment certified since 1997 has been required to have a 12.5 kHz operational mode. Licensees should check with their radio equipment vendor to determine how to ensure that the equipment is operating in the 12.5 kHz mode.

- Licensees whose equipment is capable of operating dual mode must submit a license modification to add the 12.5 kHz emission designator and, by **January 1, 2013**, file a construction notification under the existing notification procedures indicating that the system is operating at 12.5 kHz operational mode. Licensees must also delete their current wideband emission designators once the narrowbanding conversion is completed, no later than January 1, 2013.
- Licensees that employ technologies which meet the narrowbanding deadlines but fail to file a 12.5 kHz construction notification will be considered to have cancelled automatically as of January 1, 2013. Call signs of licensees failing to file 12.5 kHz construction notifications will appear on the monthly cancellation Public Notice. The Commission expects to issue a Public Notice of those tentative cancellations soon after the January 1, 2013 deadline. Reinstatement of those licenses would require a successful Petition for Reconsideration.
- Licensees whose equipment is only capable of operating at 25 kHz efficiency (equipment that is NOT capable of operating dual mode at 12.5 kHz or greater efficiencies) must replace such equipment by January 1, 2013.

Reminder: Any applications to modify the licensed emission designator must be filed through a certified frequency coordinator.