

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

In the Matter of:	)	
	)	
A National Broadband Plan for Our Future	)	GN Docket Nos. 09-47,
	)	09-51, 09-137

**COMMENTS  
OF THE  
LAND MOBILE COMMUNICATIONS COUNCIL**

The Land Mobile Communications Council (LMCC), pursuant to Section 1.415 of the Commission’s Rules, 47 C.F.R. § 1.1415, hereby respectfully submits its Comments in response to the Public Notice No. 26, Data Sought on Uses of Spectrum. LMCC supports the Commission’s efforts to consider the use of spectrum currently licensed to broadcast television stations to help meet the wireless broadband demand in the near future. We urge the Commission to fully protect land mobile radio systems in any repurpose of 470-512 MHz band broadcast television spectrum, and to consider the broadband spectrum needs of the public safety, critical infrastructure and business/industrial community as part of the repurpose of any broadcast spectrum.

**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)
- Association of Public-Safety Communications Officials-Int'l, 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)
- United Telecom Council (UTC)

## **COMMENTS**

Emerging applications for broadband communications are increasingly being recognized not only by consumers and commercial service providers, but also by public safety and government services at all levels of government, both private and public utility companies, transportation companies and private enterprise businesses and institutions. This is the same member base that LMCC serves today to enable and coordinate their wireless communications needs. Historically, LMCC has focused on the land mobile communications needs of our members. However, as our members supplement their land mobile, primarily voice communications with high speed data and broadband communications to address their high speed data, image and video transfer requirements, we recognize that we can similarly assist our

diverse user community in enabling the broadband communications systems that will help meet their advanced communications needs.

LMCC applauds the Commission for reviewing various spectrum bands in an effort to find more spectrum for broadband applications, and releasing this Public Notice specifically addressing the questions related to the repurposing of the television broadcast spectrum. While we support the repurposing of existing broadcast spectrum, we are concerned about potential interference by highly mobile broadband devices to the numerous land mobile systems populating the 470-512 MHz band (TV channels 14-20) in eleven major metropolitan areas across the country. LMR users include our largest cities' public safety agencies, government services, utility companies and enterprises and businesses. Beyond being essential for mission critical police, fire and EMS voice and data communications, these LMR operations enable important services to citizens, enhance economic growth, and provide greater safety and efficiency for the licensees' mobile workers. We urge the Commission to fully protect all land mobile radio systems in the 470-512 MHz band as it considers any repurposing of the broadcast television spectrum.

LMCC also urges the Commission to consider not only the broadband spectrum needs of commercial service providers in these proceedings but also the spectrum needs of the public safety, government services, critical infrastructure and business/industrial community in developing wireless broadband applications that meet their higher level requirements. LMCC members are conducting a study of broadband requirements and applications that are not met by commercial service providers. Recognizing that the Commission seeks quantifiable spectrum needs, LMCC is also including projections of how much broadband spectrum will be needed, beyond the public safety broadband requirements, in our study. We will develop a report of

findings to assist the Commission in this important initiative to consider the repurpose of broadcast television spectrum for not only commercial broadband services but also to meet the higher level of communications requirements of our members.

## **CONCLUSION**

LMCC supports the initiative by the Commission to address potential repurpose of the current broadcast spectrum for broadband use. We urge the Commission to consider the broadband spectrum needs of the public safety, critical infrastructure and business/industrial community as part of the repurpose of any broadcast spectrum. LMCC is developing a detailed study by our members of broadband applications and spectrum requirements to meet the broadband needs of these government and business users, and will prepare a report of findings for the Commission to aid in this important initiative. Most critically, we urge the Commission to recognize the need to fully protect all land mobile radio systems in the 470-512 MHz band as it considers any repurposing of the broadcast television spectrum.

Respectfully submitted,

/s/ Al Ittner

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