



LAND MOBILE COMMUNICATIONS COUNCIL

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LMCC Requests Clarification – Asserts FCC Public Notice on Narrowbanding Misstates LMCC Recommendations on Non-Compliant Wideband Systems

(McLean, VA) In a letter filed December 4, 2012, the LMCC has brought to the FCC's attention that FCC Public Notice DA 12-1914, released on November 30, is "inconsistent with the request the LMCC submitted to the Commission in its letter of May 21, 2012" on procedures with respect to how narrowbanding non-compliant systems are to be treated on February 1, 2013, by the FCC's certified frequency coordinators.

In the procedure outlined in their May 21 letter, the LMCC intended to provide an incentive to licensees to bring non-compliant wideband systems into compliance or risk that frequency coordinators will certify the use of additional systems on their channels. The LMCC requested that, effective February 1, 2013, non-compliant 25 kHz systems in the 150-470 MHz bands shall not be considered for purposes of identifying frequency assignments for use with land mobile systems, absent a pending modification application evidencing narrowbanding compliance or a pending or granted waiver request that seeks an extension of the January 1, 2013, narrowbanding deadline.

The FCC Public Notice filed November 30 states that "effective February 1, 2013, frequency coordinators will treat incumbent non-compliant 25 kHz systems as 12.5 kHz systems for purposes of identifying frequency assignments". This would effectively, the LMCC notes, provide "substantive, unearned benefit to non-compliant licensees at the expense of those that complied in a timely manner with the FCC's narrowbanding mandate."

The LMCC has requested that the FCC reconsider and permit the frequency coordinators to implement the process as identified in the May 21, 2012, letter.

The LMCC is a nonprofit association of nineteen organizations that represent the wireless communications interests of public safety, critical infrastructure, business, industrial, transportation, private and common carriers, and manufacturers of wireless communications equipment.