



LAND MOBILE COMMUNICATIONS COUNCIL

June 14, 2012

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

**Re: WP Docket No. 07-100
Adjacent Channel Contour Values Table
FCC Rule Section 90.187(d)(1)(C)**

Ex Parte Presentation

Dear Ms. Dortch:

Pursuant to Section 1.1206(b)(2) of the Federal Communications Commission (“FCC”) rules, the Land mobile Communications Council (“LMCC”) is submitting this written *ex parte* communication in the above-entitled proceeding.

On June 3, 2011, the LMCC submitted Further Supplemental Comments in this proceeding following extensive discussions on frequency coordination best practices that would result in enhancing the opportunity for Industrial/Business and Public Safety licensees to deploy spectrum efficient trunked radio systems in the 150-512 MHz band in accordance with FCC Rule Section 90.187.¹ At the time of that filing, the LMCC membership recognized that it would also need to identify and implement a more granular adjacent channel incumbent protection analysis that would promote the identification of exclusive use channel assignments for use within both proposed hybrid and centralized trunked systems. Following extensive technical review and substantial deliberations, the LMCC membership unanimously adopted the attached “Adjacent Channel Contour Values” (“ACCV”) table for use by the FCC-certified Public Safety and Industrial/Business frequency advisory committees during analyses performed to identify incumbents who are to be recognized as affected parties for purposes of certifying

¹ See letter from Douglas M. Aiken, President, Land Mobile Communications Council, dated June 3, 2011, which suggested further amendments to FCC Rule Sections 90.7 and 90.187.

exclusive use channels.² The Commission will note that the LMCC-adopted ACCV table recognizes all current emission designators used by incumbents and applicants, and considers as well the various channel separation scenarios that are presented in the affected 150-512 MHz bands.³

Consistent with the provisions of Rule Section 90.187(d)(1)(C), the certified frequency advisory committees are in the process of executing a Memorandum of Agreement (“MOA”) that will require “all certified frequency advisory committees” to perform their affected party analyses in compliance with the ACCV table.⁴ Upon execution, the MOA will be submitted to the Wireless Telecommunications and Public Safety and Homeland Security Bureaus for their information.

It is the LMCC’s expectation that the FCC will release a *Public Notice* regarding the use of the ACCV table by its certified frequency advisory committees as opposed to incorporating the values within FCC Rule Section 90.187. We request that the ACCV table become effective upon execution of the MOA. The advantages to this approach are that both the ACCV table and the MOA may be readily amended should the opportunity of new technologies be presented.

The LMCC would be pleased to discuss this matter further with WTB and PSHSB representatives, if necessary, to discuss implementation of the ACCV table.

Respectfully submitted,

Douglas M. Aiken

President

Attachment
Adjacent Channel Contour Values Table

² This is consistent with the LMCC-endorsed provision of FCC Rule Section 90.187(d)(1)(C), which reads, “The calculation of service and interference contours referenced in subparagraph (B) of this section and the *determination of adjacent channel protection* (emphasis added) shall be done using generally accepted engineering practices and standards which, for purposes of this section, shall be the practices and standards agreed to by written agreement of all certified frequency coordinators.”

³ The values presented in the table are based on adjacent channel coupled power values, along with empirical data, as analyzed and defined by LMCC member engineers.

⁴ On July 1, 2009, a Memorandum of Agreement was executed by a number of FCC-certified frequency advisory committees for the purpose of adopting application notification and mutual exclusivity resolution procedures for 800 MHz spectrum vacated by Sprint Nextel Corporation. This agreement is still in force.

LMCC Adopted Adjacent Channel Contour Values

Applicant seeks 7k, 8k or 11k emission, then the F(50,10) interfering contour values are:

With Incumbent Emission Identified Below at Channel Separation of:	6.25 kHz	7.5 kHz	12.5 kHz	15 kHz
4k	49	57		
7k	36	42		
8k	41	48		
11k (Note 1)	36	44		
22k	21	19	38	55

Applicant seeks 4k emission, then the F(50,10) interfering contour values are:

With Incumbent Emission Identified Below at Channel Separation of:	6.25 kHz	7.5 kHz	12.5 kHz	15 kHz
4k	NR	NR		
7k	59	82		
8k	75	NR		
11k (Note 2)	51	73		
22k	28	27	60	NR

Applicant seeks 22k emission, then the F(50,10) interfering contour values are:

With Incumbent Emission Identified Below at Channel Separation of:	6.25 kHz	7.5 kHz	12.5 kHz	15 kHz
4k	28	27	46	NR
7k	21	19	36	50
8k	21	19	40	62
11k (Note 3)	21	19	37	46
22k	21	19	26	27

Note 1 - Become 41 dBu and 48 dBu if incumbent is using digital capable analog radios.

Note 2 - Become 75 dBu and NR if incumbent is using digital capable analog radios.

Note 3 - 15 kHz separated incumbent value becomes 62 dBu if incumbent is using digital capable analog radios.

Note 4 - No analysis required "NR"

Note 5 - Digital capable analog receivers are inferred where mixed emissions are present.