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November 9, 2017

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

Re: **IB Docket No. 16-185**
Resolution No. 766 (WRC-15): Proposal to Elevate Satellite Downlinks To Primary Status in the 460-470 MHz Band
Draft Preliminary Views for WRC-19

Dear Ms. Dortch:

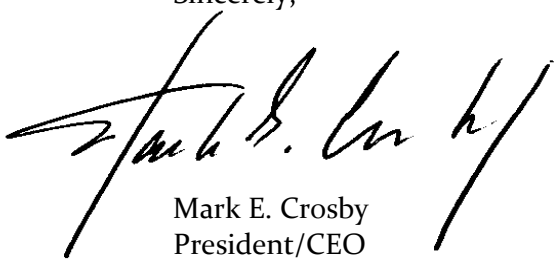
The Enterprise Wireless Alliance ("EWA" or Alliance") urges the Federal Communications Commission ("FCC" or "Commission") to modify its support for the World Radiocommunication Conference Advisory Committee ("WRC-19") recommendation ("Recommendation") with regard to Resolution No. 766 ("Resolution"). EWA represents a substantial number of land mobile licensees that operate in the 460-470 MHz band throughout the country. It also is a member of the Land Mobile Communications Council ("LMCC") that previously expressed concern about the Resolution because of the potential for destructive interference to public safety, business, industrial, and land transportation entities that rely on systems operating in that band for their safe and efficient operations.

The Recommendation supports inviting the Radiocommunication Sector of the International Telecommunication Union ("ITU-R") to consider upgrading from secondary to primary status the meteorological-satellite service (space-to-Earth) ("MetSat") allocation in the 460-470 MHz band, as well as a possible primary allocation in this same band to the Earth exploration-satellite service (space-to-Earth) ("EESS"). It calls for the ITU-R to study sharing and compatibility studies that would permit the upgrade, while also protecting existing primary fixed and mobile services, and to determine the appropriate pfd limits to be imposed on MetSat and EESS systems to protect those users. EWA nonetheless is concerned that WRC-19 has not urged adoption of the more stringent pfd level of -157.8 dBW/m^2/4kHz although, as stated in the Draft Preliminary Views for WRC-19, "Preliminary testing by the relevant United States government agencies has shown that, at satellite angles of arrival below 25 degrees, the -152 dBW/m^2/4kHz is not adequate to protect terrestrial operations."

The LMCC and the National Public Safety Telecommunications Council ("NPSTC") both submitted letters in this proceeding explaining the critical communications that are conducted in this band. Both further recommended that representatives of these land mobile users be involved in the testing called for by the Resolution and suggested other prophylactic measures that should be taken to demonstrate that terrestrial operations will be adequately protected before an upgrade from secondary to primary status is approved. The Recommendation does not address any of those proposed measures specifically, but states only that studies should be conducted and that spread spectrum or other technologies should be implemented to reduce the pfd to less than -152 dBW/m^2/4kHz "or such other levels determined necessary to protect terrestrial operations, depending on the angle of arrival."

EWA appreciates, as stated in the Recommendation, that elevating the MetSat and EESS status from secondary to primary, might well "bring confidence to the space agencies involved in Satellite Data Collection Programs" and perhaps even "ease coordination with Administrations." However, that confidence cannot be at the expense of the more than 125,000 land mobile systems operating in the 460-470 MHz band. EWA, like the LMCC and NPSTC, would be pleased to work with the WRC-19 in the development and implementation of testing procedures that will provide the data essential to protecting the interests of all potentially affected parties.

Sincerely,



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cc: Michael Mullinix (via email)