



January 13, 2015

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: WT Docket No. 02-55 (RM-11719)
Land Mobile Communications Council (“LMCC”) Request for Postponement of
the Pre-Coordination and Application Filing Deadlines for Expansion Band and
Guard Band Channels

Dear Ms. Dortch:

On January 12, 2015, the LMCC requested a 120-day extension of both the January 13, 2015 date for commencement of pre-coordination of applications and the February 10, 2015 date for filing applications for Expansion Band (“EB”) and Guard Band (“GB”) channels in the NPSPAC regions listed in Attachment A of the FCC’s December 30, 2014 Public Notice.¹ The LMCC explained that an extension was needed because, as the FCC is aware, the frequency advisory committees (“FACs”) authorized to coordinate such applications have not executed a Memorandum of Agreement (“MOA”) establishing the procedures by which such applications will be processed. Work on that MOA was suspended in light of the LMCC Petition for Rulemaking regarding interim eligibility for EB and GB channels which is pending before the FCC.²

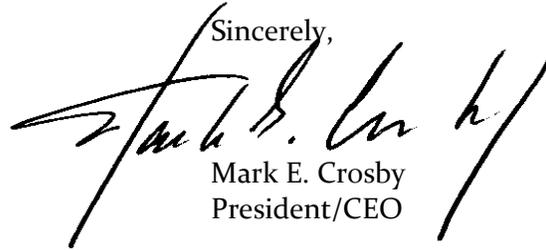
The Commission will note that one FAC, PCIA – The Wireless Infrastructure Association (“PCIA”), did not support the extension request. Since PCIA is aware that coordination procedures must be agreed upon by the participating FACS to avoid the submission of mutually exclusive EB/GB applications to the FCC, just as an MOA was adopted for 800 MHz Sprint-vacated spectrum, its position on the LMCC extension request may reflect a more optimistic view of how long it might take to finalize this MOA. However, out of an abundance of caution, EWA wishes to remind the FCC that any application filed with the Commission without having gone through the pre-coordination process required by the FCC, a process that cannot be completed until an MOA is adopted by the participating FACs, is defective and must be dismissed.

¹ Public Safety and Homeland Security Bureau and Wireless Telecommunications Bureau Announce the Completion of 800 MHz Band Reconfiguration in Certain NPSPAC Regions and the Availability of Additional Sprint Vacated Channels, *Public Notice*, WT Docket No. 02-55, DA 14-1904 (rel. Dec. 30, 2014) (“Public Notice”).

² Land Mobile Communications Council, Petition for Rulemaking Regarding Interim Eligibility for the 800 MHz Expansion Band (860-861/815-816 MHz) and Guard Band (861-862/816/817 MHz) (filed March 27, 2014).

Please direct any questions regarding this matter to my attention.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark E. Crosby". The signature is fluid and cursive, with a long horizontal stroke at the end.

Mark E. Crosby
President/CEO

cc: PCIA (via email)
Brian Marengo (via email)
Roberto Mussenden (via email)
Melvin Span (via email)
Scot Stone (via email)