



LAND MOBILE COMMUNICATIONS COUNCIL

June 23, 2010

Ruth Milkman, Esq.
Chief, Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

James A. Barnett, Jr.
Chief, Public Safety and Homeland Security Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: RM-11572 - Comments
800 MHz Interstitial Channels

Dear Ms. Milkman and Mr. Barnett:

On October 8, 2009, the WTB and the PSHSB jointly issued a Public Notice¹ requesting comments on the April 29, 2009, EWA Petition for Rulemaking requesting the FCC to initiate a proceeding to provide for the assignment of new, full-power interstitial 12.5 kHz frequencies between currently authorized 25 kHz bandwidth channels at 854-861/809-816 MHz. The Public Notice included the Petitioner's assertion that the creation of new 12.5 kHz bandwidth channels will provide greater spectrum efficiency, permit the development of new analog and digital technologies, and provide a viable spectrum alternative to new entrants without compromising incumbent operations.²

The Land Mobile Communications Council's (LMCC) Spectrum Management Task Force reviewed this matter on several occasions. During these discussions, which included the participation of public safety and business/industrial frequency advisory committees and representatives from 800 MHz equipment manufacturers, a table of "Interstitial 800 MHz Coordination Procedures" was developed for approval by the full LMCC membership. On April 27, 2010, the LMCC membership unanimously approved these recommended procedures, which are provided in Attachment A, and instructed the LMCC Secretary to submit the procedures to the FCC as additional comments in response to RM-11572. It is the LMCC's expectation, should the FCC issue a Notice of Proposed Rulemaking in this matter, that these incumbent interference

¹ See *Public Notice* DA 09-2183.

² In Reply Comments filed on November 24, 2009, several parties noted their concern with respect to the interference criteria that would be used to ensure protection of incumbent 25 kHz licensees, including those employing other than analog voice technology.

protection frequency coordination procedures will be included in that Notice for further public comment.

Please contact the undersigned should you have any questions.

Respectfully submitted,

Mark E. Crosby

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MEC:

Attachment

Cc: FCC Secretary
LMCC Membership (Via Email)
Kathy Harris (Via Email)
Roger Noel (Via Email)
Scot Stone (Via Email)
David Furth (Via Email)
Michael Wilhelm (Via Email)

Attachment A
Interstitial 800 MHz Coordination Procedures
Land Mobile Communications Council

ADJACENT CHANNEL INCUMBENT EMISSION	INTERSTITIAL PROPOSED EMISSION DESIGNATOR <i>7K-11K Emission (I/B or PS)</i>	INTERSTITIAL PROPOSED EMISSION DESIGNATOR <i>4K Emission (I/B or PS)</i>
16K or greater analog (I/B or PS)	40/38 (50/50) (reciprocal)	No analysis required
16K or greater digital (I/B or PS)	40/23 (50/50) (reciprocal)	No analysis required
11K or less (I/B or PS)	No analysis required	No analysis required
Co-channel systems	Separation requirements retained	Separation requirements retained