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July 27 2015

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: DA 15-752  
FCC File Number 0006750075  
Waiver Request – City and County of Denver, Colorado

Dear Madame Secretary:

The Enterprise Wireless Alliance (“EWA”) is pleased to provide these brief comments in response to the above-referenced waiver request submitted by the City and County of Denver, Colorado (“Denver”),<sup>1</sup> as requested in the FCC’s Public Notice released on June 26, 2015.<sup>2</sup> Denver seeks waiver authority to use Business/Industrial Land Transportation (B/ILT) channels 810/855.0625 and 810/855.5375 MHz to address coverage deficiencies in its 800 MHz simulcast system.

EWA has confirmed that there are no 800 MHz public safety channels available for assignment at the single site requested in this application. What is not clear is why the application requests authority for fixed repeaters at a permanent location. Denver is already licensed for 800 MHz frequencies at this site so authorizing additional frequencies would not appear to resolve any coverage issues it is experiencing. If 800 MHz spectrum is needed for coverage enhancement at particular locations for particular purposes as seems to be the case based on the waiver request, that need would be addressed with temporary repeaters, which also are requested in the application. However, Denver already is licensed for temporary repeaters on other 800 MHz channels under call signs WPEI989 and WQOT841.

EWA recognizes that the B/ILT channels requested are available for Denver’s use only because it has secured short-space concurrence from Denver Public Schools. To the extent that they would not be available for other B/ILT entities in any event, EWA does not object to grant of the waiver request even though it appears that the licensee already is authorized for 800 MHz public safety channels that could be used to address its coverage issues.

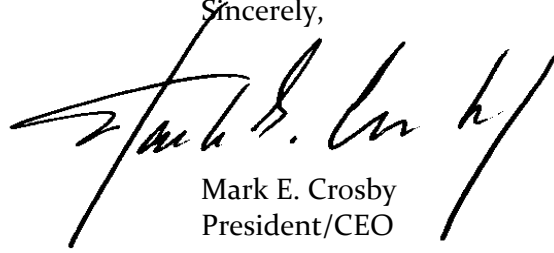
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<sup>1</sup> See File No. 0006750075 originally filed on April 13, 2015, and amended on May 18, 2015.

<sup>2</sup> See DA 15-752.

Please contact the undersigned if we may provide further information or respond to any questions regarding our comments regarding this waiver request.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark E. Crosby". The signature is fluid and cursive, with a large initial "M" and a long, sweeping underline.

Mark E. Crosby  
President/CEO

## CERTIFICATE OF SERVICE

I, Linda J. Evans, hereby certify that on this 27<sup>th</sup> day of July, 2015, I provided copies of the foregoing, by e-mail in pdf format or, alternatively, by first-class mail, postage prepaid, to the following:

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/s/ Linda J. Evans