



LAND MOBILE COMMUNICATIONS COUNCIL

August 26, 2011

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

Re: WP Docket No. 07-100
Amendment of Part 90 of the FCC Rules

Dear Madame Secretary:

On behalf of the member organizations of the Land Mobile Communications Council ("LMCC"), it is respectfully requested that the Federal Communications Commission ("FCC") take action as soon as possible in response to Kenwood USA Corporations' ("Kenwood") Request for Temporary Waiver of Section 90.425 of the Commission's rules.¹ In its request, Kenwood specifically asked that the FCC permit licensees in the Part 90 VHF and UHF bands (150-512 MHz) that are operating in digital mode to be able to transmit station identification information in digital format. This important issue was previously brought to the FCC's attention by Motorola, Inc. (now Motorola Solutions, Inc.)²

The LMCC's membership represents virtually all land mobile licensees and equipment vendors, and previously supported Motorola's recommended rule changes associated with this station identification matter.³ It has now been almost four years since the FCC first considered these and other policy issues associated with the above referenced proceeding. Since that time, a significant number of Part 90 licensees, both public safety and business/industrial entities, have enhanced their wireless communication systems through greater use of digital capabilities. This expansion of digital systems has not benefitted, however, from necessary rule changes associated with station identification requirements. In other words, these specific rules have not kept pace with technology advances in use by licensees within the Part 90 services.

¹ See Request for Temporary Waiver of Section 90.425 of the Commission's rules filed on July 12, 2011.

² See Comments of Motorola, Inc. in WP Docket No. 07-100, filed on August 13, 2007.

³ See LMCC Comments in WP Docket No. 07-100 filed on September 11, 2007.

As a consequence, licensees are forced to install Morse identifiers that are totally incompatible in digital transmission systems, adding to the cost of implementing such systems and making them less efficient by having to shift modes to identify. Additionally, the policy that limits the number of sites on each license to only six (6) sites requires larger systems to have to identify with multiple call signs. Licensees should be able to select one call sign in the system and use that to identify all transmitters. This station identification requirement is currently permitted by the FCC for CMRS stations, but not for PMRS stations.

The LMCC would be pleased to provide specific recommendations regarding this issue at the Commission's request, and we appreciate this opportunity to provide our comments in this important matter.

Sincerely,

Douglas M. Aiken

Douglas M. Aiken
President

Cc: PSHSB Chief
WTB Chief
LMCC Membership