



LAND MOBILE COMMUNICATIONS COUNCIL

STAMP AND RETURN

February 14, 2011

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

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

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Federal Communications Commission
Bureau / Office

Re: Licensing Non-Standard Frequency Pairs

Dear Ms. Milkman and Mr. Barnett:

The Land Mobile Communications Council (LMCC) is pleased to advise you that its membership has obtained a unanimous advocacy consensus position regarding the frequency coordination certification and FCC application submittal processes regarding the licensing of non-standard frequency pairs. The FCC's formal recognition and approval of the following procedures will support technical innovation, contribute to narrowbanding objectives and promote spectrum efficiency. Specific conditions under which FCC endorsement is being requested, specifically includes:

- Non-standard frequency pairs are defined as 6.25 kHz digital frequencies with 4K00F1E, 4K00F1D, 4K00F2D and 4K00F7W emission designations that are offset by 3.125 kHz from designated 12.5 kHz channel centers within the 450-470 MHz band listed within FCC Rule Sections 90.20 and 90.35;
- Licensing applicability is limited to 12.5 kHz (FB8) exclusive use channels certified by frequency advisory committees to be the deployed for use by Industrial/Business and Public Safety entities within centralized trunked systems pursuant to FCC Rule Section 90.187;
- Frequency advisory committees will certify and submit license applications listing both the 12.5 kHz and non-standard channel centers; and
- The FCC will verify or, if necessary, modify ULS to ensure that both the 12.5 kHz and non-standard channel centers are reported within ULS and appear on all affected licenses issued by the FCC.

A review of the FCC's rules indicates that rule changes to initiate this technology initiative are not required pursuant to FCC Rule Section 90.173(j). Further, the FCC's certified frequency advisory committees are prepared to immediately institute these procedures upon FCC endorsement of this industry consensus and, if it is not already, confirmation that ULS is equipped to accommodate the reporting of both 12.5 kHz channel centers and the non-standard channel centers.

We look forward to hearing from the FCC, and would be pleased to respond to any questions that the Commission may have regarding this spectrum initiative.

Sincerely,



Kenton Sturdevant
President



KS: mc

cc: LMCC Membership
Terry Fishel
David Furth
Scot Stone