

Central Station Frequency Concurrence Procedure

Revised September 4, 2019

1. The relevant Frequency Advisory Coordinator (FAC) develops application with applicant entity. For low power channel proposals, FAC will recommend a non-Group D Low Power Pool channel whenever possible, in accordance with LMCC Central Station Frequency Consensus Protocol.
2. If licensing of a central station frequency is being recommended, FAC shall forward a concurrence request to Spectrum Watch, with information needed by Spectrum Watch for time-stamping. [*See Attachment A – SpectrumWatch Procedures*]. The request shall be time stamped with the exact time of transmission to Spectrum Watch, down to the thousandth of a second. The FAC will then provide to TMA by same-day email its concurrence request with supporting information (including any frequency searches, contour plots or alternative showings called for by this procedure) at rbitton@supremealarm.com, with a copy to all other I/B coordinators that wish receive such information. The email to TMA should clearly identify the applicant, the identifier code assigned by SpectrumWatch and the time stamp received, so that TMA can match up the application with information received through the SpectrumWatch process. The time stamp established by SpectrumWatch shall be the official receipt stamp for purposes of determining order of processing of any concurrence requests, rather than the time reflected on the email to TMA.
3. Each concurrence request should include one site only, for one frequency, so as not to interfere with the que process. A coordinator can submit multiple site proposals in a single application to the FCC, but concurrence will be on a per-site basis. Applicants should be mindful of the one-channel per area restriction in the LMCC Central Station Frequency Consensus Protocol.
4. For the frequencies 460.900/465.900, 460.925/465.925, and 460.950/465.950 MHz (the “urbanized” frequencies), applicants must meet concurrence criteria (see Section 6 below) for any central station with any portion of its service area within 75 miles of a designated urbanized areas.
5. Applicant will pay any TMA concurrence fee within seven business days of the concurrence request, and any request for which a required fee is not timely received shall be rejected by TMA. Any fee payment shall include a reference number that will allow TMA to associate such payment with the appropriate application. At this time, TMA will charge only a \$25 concurrence fee for applications relying on the 100 mile service area-to-service area separation criteria (Step 1 of the Protocol), to cover

the cost of the SpectrumWatch time stamp process. **Any concurrence fee payment is non-refundable even if the proposal is rejected, and a new fee must be paid if a proposal is resubmitted.** The TMA concurrence fee schedule is Attachment B hereto.

6. The request must include all supporting documentation to justify concurrence, including one of the following: (A) a showing that there is no co-channel or otherwise affected central station alarm licensee or prior-filed applicant the operating area of which is within 100 miles of the closest point of the proposed area of operation to the closest point of the central station authorized area of operation; or (B) contour plots showing no overlap of a central station licensee's licensed service area by the 21 dBuV/m(50,10) contour(s) of the applicant's proposed operation; or (C) written consent signed by any affected central station incumbent licensee or pending applicant. The concurrence request should also include comments on technical factors such as power, antenna height and gain, terrain and other factors which may serve to minimize potential interference. If the required showing is absent or deficient, the request may be rejected.
 - a. For Scenario (A)(100 mile service area-to-service area separation), the request should include the coordinates of the proposed station; the coordinates of the closest point of the proposed service area edge along an interstation radial to any existing or pending central station facility; and a calculation of distance from service area to service area.
 - b. For Scenario (B)(contour analysis), the request must include frequency search showing the protected stations that must be addressed by the applicant; and show that the 21 dbuV/m (50,10) interference contour calculated from a non-central station system's (proposed or incumbent) fixed stations do not overlap (proposed or incumbent) central station area of operation, as reflected on its license or pending application. Information used to calculate the interference contour (e.g., coordinates, ERP) of the proposed station should be included. Each contour should be labeled clearly to show the operator/applicant's identity, and the nature of the contour (e.g., "21 dBuV/m (50,10)" or "auth. Svc. Area"). A Longley-Rice contour analysis can be used to demonstrate compliance with (B) if desired.
 - (1) Frequency search results and contour plots are always preferred to ease the concurrence process. Coordinators that currently utilize software/tools that do not generate frequency search results and/or contour plots routinely, but rather generate analytical output of search results and/or contour overlap conditions, may provide such analytical output in lieu of the frequency search results and contour plots, so long as such outputs allow TMA to verify that concurrence is justified. In any case in which an alternative showing is made, TMA reserves the right to request frequency search results and/or contour

plots for verification purposes. During the initial month in which non-central station applications are submitted for concurrence, TMA will request verifying search results/contour plots for up to five applications from each coordinator submitting applications using the analytic output alternative, for the purpose of validating the alternative process.

- c. For Scenario (C), the request must identify by frequency search the identity and call sign of any affected central station licensee/applicant for which consent is required due to a failure under Scenarios (A) and (B), and provide a signed consent letter from each such affected licensee/applicant.
7. TMA will process any concurrence request in time-stamp order, within 20 days of receipt, in accordance with Rule Section 90.175(b). Upon processing, TMA may:
 - a. Signal its concurrence with regard to the application, by email to the requesting coordinator;
 - b. Deny concurrence due to a technical reason (e.g., failure to meet the coordination criteria in the LMCC Central Station Frequency Consensus Protocol, or proposal of operating parameters that violate applicable FCC rules);
 - c. Reject the application because of overlap with an earlier-filed concurrence request by another applicant (provided that TMA's primary responsibility will be to determine time of receipt of the concurrence request, and protection of relevant central station, while ultimate acceptance or order of processing of applications by the FCC will be the responsibility of the Commission with input from the relevant FAC);
 - d. Reject the application for lack of required information; and/or,
 - e. Reject the application for lack of payment of the concurrence fee.
8. With each concurrence request response, TMA will include a calculation of the applicable fee and acknowledgement of payment, to serve as a receipt.
9. If the concurrence request is approved, the FAC will file the application with FCC, with confirmation of TMA concurrence.
10. If the concurrence request is denied for a technical reason or rejected for lack of information or payment, the request must be refiled. Any request that is refiled goes to the back of the line and will receive a new date and time stamp. There will be no provision for keeping one's place in line during a "cure" period, due to the potential risk for creating adverse impacts on the processing of other overlapping requests.

11. Periodically TMA through SpectrumWatch will send the coordinators a summary of applications submitted in receipt order.
12. Questions concerning the TMA concurrence process can be addressed to John Prendergast (jap@bloostonlaw.com) with a cc to Bob Bitton (rbitton@supremealarm.com). TMA will involve the appropriate personnel for technical questions.
13. REVISED OPENING OF NON-CENTRAL STATION FILING WINDOW: Wed. July 31, 2019 at 10:30 am Eastern.

TMA Concurrence Fees

1. Applications demonstrating 100-mile separation (service area to service area):

Concurrence Fee: \$25

2. All other applications:

Concurrence Fee: \$100

Fees can be paid by credit card or check made payable to TMA. For credit card payments, please provide the following information in the email transmitting the application information and related showings to TMA:

- payor name
- credit card number
- expiration date
- CSV

Checks should be mailed to:

Robert Bitton, FAC-TMA
c/o Supreme Security Systems, Inc.
1565 Union Avenue
Union, NJ 07083-0775

Attachment A - SpectrumWatch Procedures

Setup a time server which would be located on a URL. For example: time.sitesafe.com

In the URL the following info would be required:

- FAC#
- EBFbatchID
- Latitude of location 1 (ONLY)
- Longitude of location 1 (ONLY)
- Coordinator of application
- Step 1 Statement – No incumbent CSA stations within 100 miles (as necessary)
- Step 2 Mapping – Applicant’s interfering contour does not overlap incumbent CSA licensee’s area of operation (as necessary)
- Step 3 LOCs – Consents from all affected incumbent CSA licensees (as necessary)

Sample ...

URL: <http://time.sitesafe.com?F=<FAC>&E=<EBFBATCHID>&LAT=<LATITUDE#1 in DMS>&LON=<LONGITUDE#1 in DMS>&C=<COORDINATORCODE>>

The system will return the following:

- Time in Eastern Time Zone (17:00:00.000 would be 5 PM ET)
- Success code (which binds all the application data sent) (CODE: 5737eebc-c938-483a-b53e-74dd9c198d02)

This code would be unique to the entire process and would be serve as a receipt for the application.

We will record the IP address of where the time request comes from in case of multi computers/servers are used but we will not block.

We will auto block two requests that happen in fast succession using the following method.

Application sent and is successfully filed with time server. Time is recorded and code is given.

The hundredth of second integer value is converted to tens of second offset for new minimum send time for next successful code from that coordinator. Sending before that time will cause retry value to be set equal to 1 additional full second per retry.

Example:

Application sent at time 1:00:00.123 ET.

Min time of next application: 1:00:00.323 ET.

Application received after 1:00:00.323 ET is accepted with no problem. Application sent before this time from the same coordinator causes retry counter and minimum sent time is increased to the following: 1:00:01.323. Each additional retry before this time will add 1 second additional (2 retries in this case) would yield the following minimum send time 1:00:03.323.

This is designed to stop mass scripts or spamming the URL. Fast systems should have no problem and using hundreds of second value on the time stamp will create a level of randomness.

Potential FAC Software Modifications

- FACs need to modify their data structures to add the time stamp verification code to the Z1 record.
- FACs need to modify code so that when NOTIFICATION status is selected, their system will bundle the suggested info and send it to the time stamp engine.
- Whether the FAC chooses to add a screen to their application layout remains the choice of the FAC.

Process Summary

1. FAC selects NOTIFICATION status
2. FACs system bundles info and sends it to the time server
3. Time server returns code and time of notification
4. FAC system bundles the application data in EBF
5. Time and unique code are inserted in the Z1 record and it is added to the collected application EBF data
6. EBF data plus Z1 are added into the Interagency file for FTP download