



## LAND MOBILE COMMUNICATIONS COUNCIL

December 14, 2020

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

RE: WP Docket No. 07-100  
Seventh Further Notice of Proposed Rulemaking  
*Ex Parte* Presentation  
Support for Extension Request

Dear Ms. Dortch:

The Land Mobile Communications Council (“LMCC”) agrees with the American Association of State Highway and Transportation Officials (“AASHTO”) that the Federal Communications Commission (“Commission”) should extend the filing deadlines for the Seventh Further Notice of Proposed Rulemaking (“FNPRM”) in the above-entitled proceeding.<sup>1</sup> On December 7, AASHTO requested a 30-day delay in the Comment deadline, until January 29, 2021.<sup>2</sup> The LMCC would welcome even that extension but recommends that the Comment date be extended by approximately 60 days, until February 26, 2021. The current Comment deadline of December 30, 2020 does not provide sufficient time for interested parties to develop thoughtful input on the novel 4.9 GHz State Band Manager concept proposed in the FNPRM or the Commission’s recommendations for maximizing efficiencies in the coordination of 4.9 GHz operations.

The LMCC represents all segments of the public safety user community, as well as the Industrial/Business entities that share most spectrum allocations with them. Its membership includes the following organizations:

- American Association of State Highway and Transportation Officials (“AASHTO”)
- American Automobile Association (“AAA”)
- American Petroleum Institute (“API”)

---

<sup>1</sup> *Sixth Report and Order and Seventh Further Notice of Proposed Rulemaking*, WP Docket No. 07-100, FCC 20-137 (rel. Oct. 2, 2020).

<sup>2</sup> Although the AASHTO filing does not mention the Reply Comment deadline, the LMCC assumes that it will be extended until 30 days after the Comment date.

- Association of American Railroads (“AAR”)
- Association of Public-Safety Communications Officials-International, Inc. (“APCO”)
- Aviation Spectrum Resources, Inc. (“ASRI”)
- Enterprise Wireless Alliance (“EWA”)
- Forest Industries Telecommunications (“FIT”)
- Forestry-Conservation Communications Association (“FCCA”)
- Government Wireless Technology & Communications Association (“GWTCA”)
- International Association of Fire Chiefs (“IAFC”)
- International Municipal Signal Association (“IMSA”)
- MRFAC, Inc. (“MRFAC”)
- Telecommunications Industry Association (“TIA”)
- The Monitoring Association (“TMA”)
- Utilities Technology Council (“UTC”)
- Wireless Infrastructure Association (“WIA”)

Each of these organizations represent users with a significant interest in the outcome of this proceeding. However, their members are facing the same time and resource constraints identified in the AASHTO request. The personnel in virtually all governmental and business enterprise entities are working remotely, which engenders its own challenges as the Commission is certainly aware. Most are also contending with staffs reduced because of illness or the need to take care of those struggling with COVID-19. It most definitely is not a time of “business as usual.” While no one is anticipating a normal holiday season, the upcoming holidays nonetheless will impose even additional limits on the resources available to address regulatory matters.

The issues raised in the FNPRM demand careful consideration to ensure that this critical spectrum is optimally designed to serve the public interest. A reasonable extension of the filing deadlines during this most extraordinary time is well-warranted.

Please refer any questions regarding this matter to the undersigned.

Respectfully submitted,

**LAND MOBILE COMMUNICATIONS COUNCIL**



---

Klaus Bender, PE  
President  
2121 Cooperative Way, Suite 225  
Herndon, VA 20171