



LAND MOBILE COMMUNICATIONS COUNCIL

December 17, 2021

Mr. Mark Stephens
Managing Director
Federal Communications Commission
45 L Street, N.E.
Washington, D.C. 20554

Re: Universal Licensing System Enhancements

In the summer of 2016, the Land Mobile Communications Council (LMCC)¹ was briefed by Ms. Dorothy Stifflemire from the Wireless Telecommunications Bureau regarding the FCC's efforts to modernize the Universal Licensing System (ULS). At that time the LMCC was asked to provide the FCC with recommendations for various improvements. In response, it queried the LMCC members including all FCC-certified frequency advisory committees (FACs) for comments and suggestions for areas of improvement. We were grateful that the Commission implemented many of the LMCC's suggestions. However, the necessary level of communication and engagement has not been sustained, which is crucial given that it is not known when and if the ULS Version 2.0 will be implemented.

Lately, the ULS has experienced a high level of 502/504 gateway errors, and users continue to experience slow or non-existent service. This directly affects the interests of the FACs, all of whom are LMCC members and who represent one of the largest blocks of licensees in the ULS. It is an essential tool necessary to conduct spectrum analysis and to assist applicants to secure FCC licenses in compliance with FCC Rules. Also problematic is the lack of FCC information regarding ULS outages and downtime. Given that the FACs work in close collaboration with the licensing staffs of the WTB and PSHSB, we respectfully request that the FCC inform the LMCC when ULS operational issues occur. This will alleviate the burden on the Commission's call center and enable licensees and FACs to alter processes during these disruptive situations.

¹ The LMCC membership includes the following wireless industry associations and organizations: American Association of State Highway and Transportation Officials; American Automobile Association; American Petroleum Institute; Association of American Railroads; Association of Public-Safety Communications Officials-International; Aviation Spectrum Resources; Enterprise Wireless Alliance; Forest Industries Telecommunications; Forestry-Conservation Communications Association; Government Wireless Technology & Communications Association; International Association of Fire Chiefs; International Municipal Signal Association; MRFAC, Inc.; Telecommunications Industry Association; The Monitoring Association; Utilities Technology Council; and the Wireless Infrastructure Association. (See www.LMCC.org)

We urgently request action on this issue and ask that the Commission commit to enhance its lines of communication with the LMCC. The LMCC is willing to designate a single point-of-contact to receive and disperse information about important ULS developments and improvements. Further, it would be helpful to receive a status update on the implementation of ULS Version 2.0.

We understand the enormity of the Commission's enhancement efforts and wish to continue to serve the FCC as a reliable partner. We look forward to hearing from you, and we would be pleased to meet with your staff to discuss further details, as necessary. Please contact me if you have any questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read "David B. Smith". The signature is fluid and cursive, with a large initial "D" and "S".

David B. Smith
President

cc: Chairperson Jessica Rosenworcel
Commissioner Brendan Carr
Commissioner Geoffrey Starks
Commissioner Nathan Simington
Joel Taubenblatt, WTB Acting
Chief Lisa M. Fowlkes, PSHSB
Chief David Furth, PSHSB
Roger Noel, WTB