

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

Improving Spectrum Efficiency Through Flexible Channel Spacing and Bandwidth Utilization for Economic Area-based 800 MHz Specialized Mobile Radio Licensees) WT Docket No. 12-64
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Request for Declaratory Ruling that the Commission’s Rules Authorize Greater than 25 kHz Bandwidth Operations in the 817-824/862-869 MHz Band) WT Docket No. 11-110
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To: The Commission

**COMMENTS OF THE TELECOMMUNICATIONS
INDUSTRY ASSOCIATION**

The Telecommunications Industry Association (TIA) hereby submits supportive comments in response to the Commission’s *Notice of Proposed Rulemaking* (“NPRM”) in the above-referenced proceeding.¹ TIA is the leading trade association for the information and communications technology (ICT) industry, whose hundreds of member companies manufacture or supply the products and services used in global communications across all technology platforms. TIA represents its members on the full range of public policy issues affecting the ICT industry and forges consensus on industry standards. For over 80 years, TIA has enhanced the business environment for broadband, mobile wireless, information technology, networks, cable,

¹ Improving Spectrum Efficiency Through Flexible Channel Spacing and Bandwidth Utilization for Economic Area-based 800 MHz Specialized Radio Licensees; Request for Declaratory Ruling that the Commission’s Rules Authorize Greater than 25 kHz Bandwidth Operations in the 817-824/862-869 MHz Band, *Notice of Proposed Rulemaking*, WT Docket No. 12-64, 11-110 (rel. March 9, 2012) (“NPRM”).

satellite, and unified communications. TIA is accredited by the American National Standards Institute (ANSI).

TIA supports the Commission's proposal to eliminate the legacy channel spacing and bandwidth limitation for Economic Area-based 800 MHz Specialized Mobile Radio (SMR) licensees in the 813.5-824/858.5-869 MHz band, subject to certain conditions in order to protect public safety licensees from harmful interference, as consistent with TIA's spectrum policy and practical design principles.

I. TIA SUPPORTS THE COMMISSION'S PROPOSAL TO ELIMINATE CHANNEL SPACING LIMITATIONS FOR 800 MHZ EA-BASED SMR LICENSEES AS A MEANS TO PROMOTE SPECTRUM EFFICIENCY AND TECHNOLOGY DEPLOYMENT.

TIA applauds the Commission's decision to issue a rulemaking to address more broadly the implications and considerations for all affected licensees, particularly the public safety community. This proceeding will provide licensees with greater clarity on their ability to conduct wideband or broadband transmissions in the SMR portion of the 800 MHz band. Additionally, TIA believes the Commission should provide greater flexibility to geographic area-based licensees to use technologies that operate on contiguous spectrum as long as interference issues have been accounted for.

As the Commission notes in the NPRM, the record supports the idea that enhanced flexibility will greatly beneficial to the public interest in having more effective use of spectrum

and greater investment in innovative technologies and devices.² This assertion is supported by many comments in the record. The proposed changes significantly further the Government's interest in more efficient use of spectrum by facilitating greater, more productive uses of limited spectrum resources. Under the Commission's proposal in the NPRM, EA-based SMR licensees would be able to deploy to use wider, contiguous blocks of spectrum, which eliminates many of the difficulties associated with fragmentation. TIA is in favor of Commission actions that make additional spectrum available and usable for wireless services. Furthermore, the elimination of the channel spacing and bandwidth limitation rules for EA-based SMR licensees will be a boon to innovation in wireless services and devices. Wider bandwidth operations in the 800 MHz enable licensees to deploy new service operations and wireless technologies to make available to the public.

II. TIA SUPPORTS THE CONDITIONS PROPOSED BY THE COMMISSION TO ENSURE THAT PUBLIC SAFETY LICENSEES ARE PROTECTED FROM HARMFUL INTERFERENCE.

While fully supportive of the Commission's proposed rule changes in this matter, TIA stresses that the Commission should ensure that it considers potential interference issues for all licensees and provides appropriate protection.³ TIA especially recognizes the critical nature of public safety operations in the 800 MHz band and fully supports the conditions proposed by the Commission⁴ to protect these entities from interference. The proposed conditions properly

² See NPRM at ¶ 12.

³ See, e.g., Comments of TIA, WT Docket No. 03-66 (filed Jul. 7, 2011) at 4.

⁴ See NPRM at ¶ 13-14.

recognize the concerns raised by Motorola Solutions about co-existing operations between EA-based SMR licensees in the 821-824/866-869 MHz bands in most areas of the country until 800 MHz band reconfiguration is completed.⁵ The conditions placed on EA-based licensees' ability to exceed the channel spacing requirements are appropriate and fair to ensure the ability of public safety licensees to continue to provide reliable service.

III. CONCLUSION

For the foregoing reasons, TIA urges the Commission's to adopt the recommendations above.

Respectfully submitted,

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

By: /s/ Danielle Coffey

Danielle Coffey
Vice President, Government Affairs

Mark Uncapher
Director, Regulatory and Government Affairs

Brian Scarpelli
Manager, Government Affairs

TELECOMMUNICATIONS INDUSTRY ASSOCIATION
10 G Street N.E.
Suite 550
Washington, D.C. 20002
(202) 346-3240

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⁵ See Comments of Motorola Solutions, Inc., WT Docket No. 11-110 (Aug. 1, 2011) at 2.