

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Amendment of Part 90 of the Commission's Rules to Improve Access to Private Land Mobile Radio Spectrum	)	WP Docket No. 16-261
	)	
Land Mobile Communications Council	)	RM-11719
Petition for Rulemaking Regarding Interim Eligibility for 800 MHz Expansion Band and Guard Band Frequencies	)	
	)	
Petition for Rulemaking Regarding Conditional Licensing Authority	)	RM-11722
	)	

**To: The Commission**

**EX PARTE COMMENTS**


The Monitoring Association (formerly the Central Station Alarm Association) and the related Alarm Industry Communications Committee ("AICC")(collectively "TMA") and the Land Mobile Communications Council (LMCC) hereby submit an amended version of the coordination protocols submitted into this docket on May 8, 2017, in connection with implementation of the terms of the Consensus Plan for greater use of the central station alarm frequencies attached to the December 22, 2016 Reply Comments of LMCC and TMA. At its Annual Meeting held on April 18, 2018, LMCC finalized without objection from any member the attached changes to the coordination protocols, which changes more explicitly address the adjacent channel interference aspect of the coordination process, and describe the considerations

underlying the proposal to allow only FB8 operations on central station frequencies to the extent that they are made available for land mobile use by the parties' December 22 Plan.


Consistent with Section 1.1206 of the Commission's Rules, 47 C.F.R. §1.1206, one copy of this notice is being filed electronically and in native format in the above-captioned proceeding.

Respectfully submitted,

**THE MONITORING ASSOCIATION**

By:   
John A. Prendergast  
Blooston, Mordkofsky, Dickens, Duffy  
& Prendergast, LLP  
2120 L Street, N.W., Suite 300  
Washington, DC 20037  
Tel. 202-828-5540  
*Its Attorney*

**LAND MOBILE COMMUNICATIONS  
COUNCIL**

By:   
David Smith, President  
2121 Cooperative Way, Suite 225  
Herndon, VA 20171  
Phone: (202) 434-4178

Filed: April 20, 2018

**Consensus Protocol for Frequency Coordination on 90.35(c)(63) Frequencies  
WP Docket No. 16-261- Amendment of the Commission's Rules to Improve Access  
to Private Land Mobile Radio Spectrum**

Pursuant to the Commission's *Notice of Proposed Rulemaking* in the above-referenced docket,<sup>1</sup> the Land Mobile Communications Council (LMCC), of which every Part 90 Federal Communication Commission (FCC)-certified frequency advisory committee is a member, is pleased to submit the attached "Consensus Protocol for 90.35(c)(63) Frequency Coordination" as proposed in LMCC's Reply Comments in this proceeding. The LMCC understands that this protocol will be evaluated by the WTB. It is further understood that until the protocol is approved, as announced by FCC *Public Notice*, the FCC will not accept applications by non-central station eligibles for facilities on the frequencies in question.<sup>2</sup>

Upon acceptance, the LMCC will post the protocols on its website ([www.lmcc.org](http://www.lmcc.org)) to enhance industry awareness of the FCC rule changes and the spectrum opportunity for both central station and non-central station systems. We look forward to responding to any questions the Bureaus may have regarding the proposed consensus coordination protocol.

---

<sup>1</sup> In the Matter of Amendment of Part 90 of the Commission's Rules to Improve Access to Private Land Mobile Radio Spectrum, WP Docket No. 16-261, *Notice of Proposed Rulemaking*, 31 FCC Rcd 9431 (2015) ("NPRM").

<sup>2</sup> The frequencies are 460.900 MHz, 465.900 MHz, 460.925 MHz, 465.925 MHz, 460.950 MHz and 465.950 MHz.

**Land Mobile Communications Council**  
**Consensus Protocol for Frequency Coordination on 90.35(c)(63) Frequencies**

---

**General Procedures**

This protocol represents a consensus among the LMCC members that coordinate Industrial/Business Pool applications, for the coordination of non-central station operations using the “urban” central station alarm frequencies (designated by reference to Rule Section 90.35(c)(63), and in certain instances [pursuant to a waiver request] the “nationwide” central station alarm frequencies (designated by reference to Rule Section 90.35(c)(66)).

**Urban Channels**

- The urban central station voice channels (460.900, 465.900, 460.925, 465.925, 460.950 and 465.950 MHz) will be available for all Part 90 Industrial/Business Pool applicants proposing FB8 operations only, given the scarcity of FB8-suitable channels in urban areas. Applicants shall seek concurrence from The Monitoring Association (“TMA”, formerly CSAA) for use of these channels for the purpose of ensuring that incumbent central station alarm operations will be protected from interference in accordance with the FCC’s rules and the coordination protocol below. Pursuant to this protection protocol, non-central station applicants will demonstrate that the proposed 21 dbuVm interference contour will not overlap the incumbent central station licensee’s area of operation, as reflected on its license. The protocol will also provide for the protection of fixed alarm radios at protected premises (which are classified as “mobiles” under Rule Section 90.267) from mobile-only licensees on the central station voice channels.
- Incumbent central station systems will be protected as if licensed for primary voice and/or data as station class FB8, within the licensed service area, even if operating in conventional mode and/or for alarm signaling only.
- Non-central station systems will be subject to the requirements of FCC Rule Section 90.187 with regard to co-channel non-central station licenses.

## **Nationwide Channels**

- The nationwide central station voice channels (460.975/ 465.975 and 461.000/465.000 MHz) remain assigned exclusively for central station use.
- TMA will consider concurring with waiver requests to utilize the nationwide central station voice channels, based on a showing that there are no exclusive use (FB8) frequencies available in the applicant's primary pool, and subject to the "Last Available Voice Channel" protocol below.

## **Alarm Data Operations Co-primary**

- Coordination of non-central station operations on any of the central station voice channels will recognize data use by a neighboring central station as a co-primary use, and protect such operation accordingly.

## **Last Available Voice Channel**

- In order to ensure the availability of at least one higher powered voice/data frequency pair for future central station operations, TMA will not be required to concur in, and other frequency coordinators shall not coordinate, an application for a central station urban frequency (or a central station nationwide frequency with a waiver request) if it would utilize all or part of the last available central station voice channel pair within a 75-mile radius of the center coordinates (as specified in FCC Rule Section 90.741) of any of the urbanized area(s) defined in FCC Rule Section 90.35(c)(63).

## **Low-power Group D Channels**

- All of the 12.5 kHz and 6.25 kHz low-power Group D Channels would remain assigned for central station use only, as currently designated by Rule Sections 90.35(c)(63), (65), (66), (83) and (87), as applicable and Rule Section 90.267(f)(5), and central station alarm signaling on these frequencies will be co-primary to with regard to co-channel or adjacent channel base, mobile or data operations. The 21 dbuV/m (50,10) interference contour calculated from a non-central station system's (proposed or incumbent) fixed stations must not overlap the (proposed or incumbent) central station area of operation, as reflected on its license. Voice operations will not be allowed on any of the Group D Channels.

## **Frequency Coordination Process**

- Step 1 – If the distance between a non-central station facility (proposed or incumbent) and a co-channel or adjacent channel central station operation (proposed or incumbent) is 160 km (100 miles) or greater as measured from the closest point of the non-central station area of operation, as defined by either a County border or the edge of a maximum area of operation limited to a 80 km distance from center coordinates of normal day-to-day operations, to the edge of the central station's licensed area of operation, the application may be certified.
- Step 2 – Should proposed and incumbent (co-channel or adjacent channel) primary systems be closer than 160 km (100 miles), then an application may be certified if 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) primary central station area of operation, as reflected on its license. The 21 dbuV/m (50,10) interference contour shall be performed using generally accepted engineering practices and standards.
- Step 3 – If the frequency coordination analysis fails Step 2, applications may be certified if accompanied by a letter of consent from all licensees whose systems could not be protected pursuant to the analysis required in Step 2.