

LAND MOBILE COMMUNICATIONS COUNCIL

March 21, 2019

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
4445 Twelfth Street, SW
Washington, DC 20554

RE: WP Docket No. 15-32
WP Docket No. 16-261
800 MHz Interstitial Channels
Ex Parte Presentation

Dear Ms. Dortch:

The Land Mobile Communications Council (“LMCC”) is submitting the attached Interference Contour Matrix (“Matrix”) in response to the Report and Order and Order adopted by the Federal Communications Commission (“FCC”) in the above-referenced proceedings.¹ The Matrix specifies recommended derating factors to be used when Frequency Advisory Committees (“FACs”) process applications for full-channel 25 kHz or adjacent channel 12.5 kHz “Interstitial” 800 MHz frequencies. The factors are based on using an F(50,10) curve when calculating an interference contour and, utilizing both incumbent and proposed system emission designators, are intended to promote spectral efficiency by minimizing the necessary separation between transmitter sites on adjacent channels. The LMCC had previously submitted a matrix that was based on its recommended F(50,50) curve, but the FCC rejected that proposal and elected to retain the traditional F(50,10) curve, which necessitated changes to the derating factors.

The LMCC has requested reconsideration of this aspect of the R&O.² However, in the event that the FCC does not grant the PFR, the derating factors in the Matrix must be used to promote spectrum efficiency and ensure appropriate levels of interference protection for both full-channel and interstitial channel systems. For the reasons detailed in the PFR, the LMCC also urges the FCC not to include the Matrix in the rules. Instead, the last sentence of Rule

¹ In the Matter of Creation of Interstitial 12.5 Kiloherz Channels in the 800 MHz Band Between 809-817/854-862 MHz, WP Docket No. 15-32, *Report and Order and Order*, 83 FR 61072 (Nov. 27, 2018) (“R&O”).

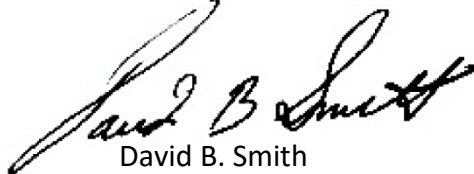
² See *Public Notice*, Petition for Reconsideration of Action in Proceeding, Report No. 3115 (Mar. 7, 2019) (“PFR”).

Section 90.621(d)(2) should be modified to read: "The incumbent's interference contour is determined using the dBu level listed in the appropriate table on the Land Mobile Communications Council (LMCC) website: <http://lmcc.org/policy-advocacy/consensus-filings>."

Please refer any questions regarding this matter to the undersigned.

Respectfully submitted,

LAND MOBILE COMMUNICATIONS COUNCIL

A handwritten signature in black ink, appearing to read "David B. Smith". The signature is written in a cursive style with a large, sweeping initial "D".

David B. Smith

President

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Attachment

cc via e-mail:
Michael Wilhelm
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Table 1 – Interference Contour Level for Fixed Station Operating on 12.5 kilohertz Bandwidth Channel

Interference Contour (12.5 kilohertz into 25 kilohertz channel)		12.5 kilohertz Bandwidth Technology of 12.5 kilohertz Bandwidth Channel				
		Transmitter Emission				
25 kilohertz Technology on 25 kilohertz Bandwidth Channel		11K3F3E or less	8K10F1E 8K10F1D 8K70D1W 9K80D7W	7K60FXE 7K60FXD 7K60F7E 7K60F7D 7K60F7W 8K30F1E 8K30F1D	4K00F1E 4K00F1D	11K0F7E 11K0F7D 11K0F7W
		Transmitter	Transmitter	Transmitter	Transmitter	Transmitter
Transmitter Emission		Interference Contour [dBu F (50,10)]				
16K0F3E or 20K0F3E	Receiver	28	25	28	NA	23
10K0F1E or 10K0F1D	Receiver	40	36	40	NA	28
12K5F9W	Receiver	40	36	40	NA	32
16K0F1E or 16K0F1D	Receiver	70	65	65	NA	NA
18K3D7W or 17K7D7D	Receiver	28	25	28	NA	20
12.5 kilohertz Bandwidth Technology on 25 kilohertz Bandwidth Channel						
Transmitter Emission		Interference Contour [dBu F (50,10)]				
11K3F3E or less	Receiver	65	65	65	NA	70
8K10F1E, 8K10F1D, 8K70D1W, 9K80D7W, 9K80D1E or 9K80D1D	Receiver	NA	75	75	NA	NA
7K60FXE, 7K60FXD, 7K60F7E, 7K60F7D, 7K60F7W, 8K30F1E or 8K30F1D	Receiver	NA	75	75	NA	NA
4K00F1E or 4K00F1D	Receiver	NA	NA	NA	NA	NA
11K0F7E, 11K0F7D or 11K0F7W	Receiver	60	55	60	NA	NA
Section 90.221 Technology on 25 kilohertz Bandwidth Channels						
Transmitter Emission		Interference Contour [dBu F (50,10)]				
22K0D7E, 22K0D7D, 22K0D7W, 22K0DXW or 22K0G1W	Receiver	28	25	28	45	20
21K0D1E, 21K0D1D or 21K0D1W	Receiver	28	25	28	NA	20
21K7D7E, 21K7D7D or 21K0D1W	Receiver	28	25	28	NA	20

Table 2 – Interference Contour Level for Fixed Station Operating on 25 kilohertz Bandwidth Channel

Interference Contour (25 kilohertz into 12.5 kilohertz channel)		12.5 kilohertz Bandwidth Technology of 12.5 kilohertz Bandwidth Channel				
		Transmitter Emission				
25 kilohertz Technology on 25 kilohertz Bandwidth Channel		11K3F3E or less	8K10F1E 8K10F1D 8K70D1W 9K80D7W	7K60FXE 7K60FXD 7K60F7E 7K60F7D 7K60F7W 8K30F1E 8K30F1D	4K00F1E 4K00F1D	11K0F7E 11K0F7D 11K0F7W
		Receiver	Receiver	Receiver	Receiver	Receiver
Transmitter Emission		Interference Contour [dBu F (50, 10)]				
16K0F3E or 20K0F3E	Transmitter	40	50	45	NA	36
10K0F1E or 10K0F1D	Transmitter	50	50	50	NA	50
12K5F9W	Transmitter	40	50	45	NA	36
16K0F1E or 16K0F1D	Transmitter	36	40	40	NA	36
18K3D7W or 17K7D7D	Transmitter	25	45	32	NA	23
12.5 kilohertz Bandwidth Technology on 25 kilohertz Bandwidth Channel						
Transmitter Emission		Interference Contour [dBu F (50,10)]				
11K3F3E or less	Transmitter	65	NA	75	NA	60
8K10F1E, 8K10F1D, 8K70D1W, 9K80D7W, 9K80D1E or 9K80D1D	Transmitter	65	75	70	NA	55
7K60FXE, 7K60FXD, 7K60F7E, 7K60F7D, 7K60F7W, 8K30F1E or 8K30F1D	Transmitter	65	75	75	NA	60
4K00F1E or 4K00F1D	Transmitter	NA	NA	NA	NA	NA
11K0F7E, 11K0F7D or 11K0F7W	Transmitter	70	NA	NA	NA	NA
Section 90.221 Technology on 25 kilohertz Bandwidth Channels						
Transmitter Emission		Interference Contour [dBu F (50,10)]				
22K0D7E,22K0D7D, 22K0D7W, 22K0DXW or 22K0G1W	Transmitter	25	28	25	32	23
21K0D1E, 21K0D1D or 21K0D1W	Transmitter	25	28	25	NA	23
21K7D7E, 21K7D7D or 21K0D1W	Transmitter	23	25	23	NA	20