

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of	)	
	)	
Aroostook County, ME	)	DA 25-551
Request for Waiver	)	File No. 0011470989 (lead)
To License an Industrial/Business Pool	)	
Channel	)	

To: Chief, Public Safety and Homeland Security Bureau

**COMMENTS  
OF THE  
ENTERPRISE WIRELESS ALLIANCE**

The Enterprise Wireless Alliance (“EWA”), in accordance with Section 1.415 of the Federal Communications Commission (“FCC”) rules, supports the waiver request (“Waiver Request”) from the County of Aroostook, Maine (“County” or Aroostook”) to license an Industrial/Business (“I/B”) Pool channel as the second countywide frequency in its fifteen-site VHF conventional system.<sup>1</sup> EWA supports all legitimate requests to use spectrum that otherwise is lying fallow when the applicant’s requirements cannot be fulfilled with spectrum allocated for its use.

In its Waiver Request, Aroostook explains that it is attempting to replace a system that is end-of-life and that the process has been delayed for more than two years while the County searched unsuccessfully for available spectrum. The County is in northern Maine, which makes frequency searches even more challenging in bands such as VHF that require Canadian concurrence. The Waiver Request is accompanied by APCO’s certification that there are no

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<sup>1</sup> *The Public Safety and Homeland Security Bureau Seeks Comment on Applications and an Associated Waiver Request from Aroostook, Maine to License a Channel from the Industrial/Business Pool*, Public Notice, DA 25-551 (rel. June 27, 2025).

Public Safety (“PS”) VHF frequencies assignable at the County’s sites.<sup>2</sup> EWA appreciates that the County’s need for a frequency that can be licensed at fifteen sites throughout its expansive geographic area undoubtedly makes the search even more challenging.

The I/B frequency Aroostook has identified for use is designated as LA, automobile emergency service, and the applications are accompanied by consent letters from AAA, the primary frequency coordinator for LA frequencies.<sup>3</sup> It is fortuitous for the County that this frequency is available throughout its operation area and EWA is pleased that it will be placed into productive use serving the public. EWA also notes that this availability is further confirmation that imposing special coordination procedures on auto emergency frequencies – and other I/B frequencies – pursuant to Rule Sections 90.35(b)(1)-(3) no longer serves a public interest purpose, if it ever did. Those special protections can result in less than robust use of those frequencies and always add both cost and time to the coordination process. EWA has recommended that those procedures be eliminated and urges the FCC to move forward with EWA’s Petition for Rulemaking at its earliest opportunity.<sup>4</sup>

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<sup>2</sup> APCO’s supporting statement notes that a significant number of PS VHF frequencies are licensed for use in the State of Maine’s statewide system.


<sup>3</sup> The consent letters are on AAA letterhead but the Frequency Analyst who signed the letters, Francine Cook, is an employee of RadioSoft, not AAA. RadioSoft is not an FCC-certified Frequency Advisory Committee. EWA can only assume AAA has advised the FCC that AAA has authorized RadioSoft employees to sign letters on its behalf and that the FCC is satisfied with that arrangement.

<sup>4</sup> See Petition for Rulemaking of Enterprise Wireless Alliance, RM-11979 (filed Mar. 23, 2023).

Because Aroostook has demonstrated its need for waiver relief, EWA recommends grant of the County's Waiver Requests.

Respectfully submitted,

**ENTERPRISE WIRELESS ALLIANCE**

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