



## LAND MOBILE COMMUNICATIONS COUNCIL

May 21, 2012

Mr. David Furth  
Acting Bureau Chief  
Public Safety and Homeland Security Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, N.W.  
Washington, D.C. 20554

Mr. Rick Kaplan  
Bureau Chief  
Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, N.W.  
Washington, D.C. 20554

Re: WT Docket No. 99-87  
Consideration of Non-Compliant Systems

Dear Sirs:

During its April 18, 2012, Annual Meeting, the membership of the Land Mobile Communications Council (LMCC), which includes every FCC-certified frequency advisory committee, agreed to adopt the following procedure with respect to systems that are non-compliant with the FCC's narrowbanding requirement as specified in FCC Rule Section 90.209(b):

*Effective February 1, 2013, non-compliant 25 kHz systems in the 150-470 MHz bands shall not be considered by the Industrial/Business and Public Safety frequency advisory committees for purposes of identifying frequency assignments for use with land mobile systems, pursuant to FCC Rule Section 90.187 and other applicable FCC Part 90 Rules, absent a pending modification application evidencing narrowbanding compliance or a pending or granted waiver request that seeks an extension of the January 1, 2013, narrowbanding deadline.*

This coordination procedure supports two important objectives. First, it will promote compliance with system narrowbanding and, second, it will promote spectrum efficiency through the advancement of hybrid/centralized trunked systems that are optimized through exclusive use channel assignments.

It is the LMCC's expectation that the FCC will be releasing further *Public Notices* regarding compliance with the Commission's narrowbanding requirements. Assuming the FCC accepts this LMCC-endorsed frequency coordination procedure, we recommend that it be reported in a future *Public Notice*. In the interim, the LMCC and its members will be advising their respective members and customers of this LMCC decision and its implementation, pending FCC approval.

Should you have any questions or comments regarding this matter, please contact me. We would also be pleased to meet with the Bureaus, if necessary, to discuss and refine this LMCC procedure. We look forward to hearing from you.

Sincerely,

*Douglas M. Aiken*

President

DMA:

cc: FCC Secretary  
LMCC Membership