

8300 Greensboro Dr.  
Suite 1200  
McLean, VA 22102

(703) 584-8663  
WWW.FCCLAW.COM  
NOT ADMITTED IN VA

**LNGS** | LUKAS,  
NACE,  
GUTIERREZ  
& SACHS, LLP

Writer's E-mail  
[lsachs@fcclaw.com](mailto:lsachs@fcclaw.com)

December 31, 2015

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

**Re: RM-11719  
WP Docket No. 15-32  
WT Docket No. 99-87  
WT Docket No. 07-250  
PS Docket No. 13-42  
PS Docket No. 13-229**

**Ex Parte Presentation**

Dear Ms. Dortch:

On December 30, 2015, Mark E. Crosby, President and CEO, Enterprise Wireless Alliance (“EWA”) and undersigned counsel for EWA, met with the staff of the Wireless Telecommunications Bureau listed below. The parties discussed the following FCC proceedings:

RM-11719: EWA discussed the definition of incumbents for purposes of the LMCC Petition for Rulemaking proposing that the FCC allow incumbent licensees access to 800 MHz Expansion Band and Guard Band channels to expand existing systems prior to opening the spectrum to new entrants and urged the FCC to act on that Petition expeditiously.

WP Docket No. 15-32: EWA detailed the LMCC efforts in developing the interference contour analyses the LMCC proposed be used by Frequency Advisory Committees (“FACs”) when coordinating applications for 800 MHz interstitial channels. EWA urged the FCC to adopt final rules in that proceeding as promptly as possible.

WT Docket No. 99-87: EWA reminded the FCC that the LMCC was waiting for clarification with regard to whether Part 90 VHF and UHF licensees whose authorizations reflect

only unauthorized wideband emissions are considered “affected licensees” for purposes of coordinating applications under FCC Rule Section 90.187.

WT Docket No. 07-250: EWA advised the FCC that the recent modification of FCC Rule Section 20.19 appears to extend the hearing aid compatibility requirement to all digital 800/900 MHz SMR licensees, even those that do not offer telephone capability and that had not been subject to this requirement under the previous definition. EWA explained that it was discussing the issue with equipment vendors serving this market and, depending on their responses, might need to seek clarification or reconsideration of the new rule.

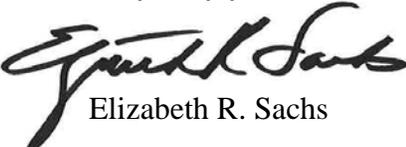
PS Docket No. 13-42: EWA questioned when the FCC might provide guidance regarding the likely future of industrial, business, and commercial licensees operating on 470-512 MHz T-Band spectrum. This spectrum is subject to a highly restrictive freeze in response to the 2012 Spectrum Act, although that legislation addresses only the auctioning of T-Band spectrum “currently used by public safety eligibles” and does not allow auction funds to be used for the relocation of non-public safety systems.

PS Docket No. 13-229: EWA explained that there was pent-up demand to deploy vehicular repeater systems (“VRS”) pursuant to the recently adopted rules in this proceeding and asked the FCC to act promptly on the LMCC-recommended protocols for coordination of VRS and data telemetry systems on the channels in question.

This letter is being filed electronically, in accordance with Section 1.1206(b) of the Commission’s Rules, 47 C.F.R. § 1.1206(b), for inclusion in the record in these proceedings.

Kindly refer any questions or correspondence regarding this matter to the undersigned.

Very truly yours,



Elizabeth R. Sachs

cc: Brian Regan, WTB (attended via telephone) (via email)  
Scot Stone, WTB (via email)