

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

In the Matter of)
)
Engineers Frequency Advisory Committee, LLC) WP Docket No. 14-235
Request for Certification as a Part 90)
Frequency Advisory Committee)

To: Chief, Wireless Telecommunications Bureau
Chief, Public Safety and Homeland Security Bureau

**REPLY COMMENTS
OF THE
ENTERPRISE WIRELESS ALLIANCE**

The Enterprise Wireless Alliance (“EWA” or “Alliance”), in accordance with Section 1.45 of the Federal Communications Commission (“FCC” or “Commission”) rules, respectfully submits its Reply Comments in the above-entitled proceeding.¹ The Public Notice invited comment on the request from Engineers Frequency Advisory Committee, LLC (“EFAC”) to be certified to coordinate frequencies under Part 90 of the Commission’s Rules.² EWA is a member of the Land Mobile Communications Council (“LMCC”) and endorses the Reply Comments filed by the LMCC, which are consistent with the comments and *ex parte* submissions of various FCC-certified Frequency Advisory Committees (“FACs”) in which they have challenged EFAC’s ability to satisfy the representativeness criterion for FAC certification.

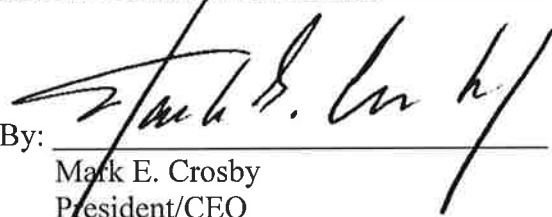
While EWA thus agrees with the substantive arguments in the Comments filed by the Association of Public Safety Communications Officials-International, Inc. (“APCO”), the Alliance must take issue with APCO’s cavalier, and entirely erroneous, suggestion that while chaotic frequency coordination would be disastrous on public safety frequencies, it might be tolerated for

¹ Wireless Telecommunications Bureau and Public Safety and Homeland Security Bureau Seek Comment on Request of Engineers Frequency Advisory Committee, LLC to be Certified as a Part 90 Frequency Coordinator, *Public Notice*, WP Docket No. 14-235, DA 14-1729 (rel. Dec. 2, 2014) (“Public Notice”).

² Request for Certification (filed Nov. 4, 2014).

frequencies in the Industrial/Business (“I/B”) Pool.³ Surely APCO does not actually believe that the communications of power plants, electric utilities, pipelines, airlines, railroads, and the myriad other entities that provide essential services to the American public, oftentimes with critical safety implications for their employees and the public, could or should be governed by a “Wild West”⁴ frequency coordination process. In fact, the qualifications of I/B FACs must be maintained at the highest level since, unlike public safety FACs, they do not assume that all systems qualify for exclusive frequency assignments. I/B FACs not only conduct analyses under Sections 90.187 and 90.621 to determine whether the requirements for exclusivity have been satisfied, but also identify the optimal shared frequency environment when the exclusivity criteria have not been met. Moreover, to the extent that APCO periodically seeks I/B frequencies for its constituents when it asserts that there are no assignable public safety frequencies, it presumably would not want those licensees to be subjected to a “Wild West” coordination environment.

ENTERPRISE WIRELESS ALLIANCE

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³ APCO Comments at 7 (filed Jan. 5, 2015).

⁴ *Id.*

Your submission has been accepted

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14-235	Comment Sought on Engineers Frequency Advisory Committee, LLC Request
Contact Info	
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