



13221 Woodland Park Road, Suite 410
Herndon, VA 20171

17750 Creamery Road, Suite B10 South
Emmitsburg, MD 21727

800-482-8282
Fax: 703-524-1074
www.EnterpriseWireless.org

September 16, 2022

VIA EMAIL (mark.colombo@fcc.gov)

Mr. Mark Colombo
Media Bureau
Federal Communications Commission
45 L Street, N.E.
Washington, D.C. 20554

Re: Draft MB Docket No. 22-227

Dear Mr. Colombo:

As we discussed, the draft Notice of Proposed Rulemaking (“NPRM”) to be considered at the Federal Communication Commission (“FCC”) September 2022 Open Meeting proposes changes to subpart E of Part 73 of the FCC rules as a result of the broadcast television industry transition from analog to digital-only operations.¹ The NPRM expressly recognizes the ongoing obligation of full power and Class A television stations to protect certain channels for use by land mobile radio systems in certain U.S. cities.² FCC Rule Section 73.623(e) specifies that protection is based on distance separation from the city center of the land mobile markets, the coordinates of which are identified in that rule.

The NPRM notes that the current coordinates were calculated based on the 1927 North American Datum (“NAD 27”), which has been superseded by the 1983 North American Datum (“NAD 83”), the result of improved technology and measurement capabilities. The NPRM proposes to update the coordinates to use NAD 83. It also notes that this update would serve the public interest, as it would conform the coordinates with those in FCC Rule Section 90.303(b) that are used for the licensing of land mobile systems operating on that spectrum in those markets.

The Enterprise Wireless Alliance (“EWA”) agrees that these two rule sections should be mirror images to avoid any future issues about whether the protection afforded land mobile operations is in compliance with FCC requirement. It therefore

¹ *Amendment of Part 73 of the Commission’s Rules to Update Television and Class A Television Broadcast Station Rules, and Rules Applicable to All Broadcast Stations*, MB Docket No. 22-227, Notice of Proposed Rulemaking, FCC-CIRC2209-04.

² NPRM at ¶ 31.

Ms. Marlene H. Dortch

September 16, 2022

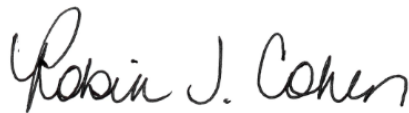
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recommends that the longitude for the Miami, Florida market be corrected to 080-11-31.2 in FCC Rule Section 73.623(e) to be consistent with the longitude in Rule Section 90.303(b).

We very much appreciate your ongoing assistance in addressing issues related to land mobile operations on T-Band spectrum.

Sincerely,

ENTERPRISE WIRELESS ALLIANCE



Robin J. Cohen

President/CEO

13221 Woodland Park Road, Suite 410

Herndon, VA 20171

(703) 528-5115

robin.cohen@enterprisewireless.org

cc via e-mail:

Joyce Bernstein

Emily Harrison

Roger Noel

Joshua Smith