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August 8, 2011

Office of the Secretary
Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: WP Docket No. 07-100
Amendment of Part 90 of the FCC Rules

Dear Madame Secretary:

The Enterprise Wireless Alliance (“EWA” or “Alliance”) respectfully requests the Federal Communications Commission (“FCC” or “Commission”) to take action promptly in response to the recent Request for Temporary Waiver of Section 90.425 of the Commission’s Rules (“Waiver Request”) filed by Kenwood USA Corporation (“Kenwood”). In the Waiver Request, Kenwood asks that the FCC permit licensees in the Part 90 VHF (150-174 MHz) and UHF (421-512 MHz) bands operating in digital mode to transmit station identification information in digital format.¹ Kenwood also asks that stations be permitted to use a single call sign for commonly owned facilities that are operated as part of a single system and that the transmission of station identification be allowed on the lowest trunked frequency in a VHF or UHF trunk group.²

These same issues were raised previously in this proceeding by Motorola, Inc. (now Motorola Solutions, Inc.) (“Motorola”). The Land Mobile Communications Council, an organization whose members represent virtually all land mobile licensees and equipment vendors, supported Motorola’s recommended rule changes.³ These matters have been pending before the Commission for almost four years while the FCC considers others aspects of this multi-issue rulemaking proceeding.⁴

In the intervening four years, an increasing number of users in the Part 90 services have migrated from analog to digital systems. That migration likely will accelerate as licensees comply with the January 1, 2013 deadline by which systems in the Part 90 VHF and UHF bands must convert to narrowband technology.⁵ The industry has made great strides in expanding the equipment options available for this segment of the

¹ See Request for Temporary Waiver of Section 90.425 of the Commission’s Rules (filed July 12, 2011).

² *Id.*

³ See Comments of the Land Mobile Communications Council, WP Docket No. 07-100 (filed Sept. 11, 2007).

⁴ See Comments of Motorola, Inc., WP Docket No. 07-100 (filed Aug. 13, 2007).

⁵ See Implementation of Sections 309(j) and 337 of the Communications Act of 1934 as Amended, *Third Memorandum Opinion and Order, Third Further Notice of Proposed Rule Making and Order*, WT Docket No. 99-87, 19 FCC Rcd 25045 (2004); see also 47 C.F.R. § 90.209(b)(5).

telecommunications industry and, in particular, providing digital alternatives that both promote spectrum efficiency and expand user capabilities. Therefore, it has become increasingly important that the Commission address the issue of digital station identification as promptly as possible.

There already is an extensive record in this proceeding with regard to rule changes related to station identification issues. It is clear that these rule modification have broad industry support. Recognizing that the Kenwood and Motorola recommendations are not identical vis-à-vis whether digital station identification should be permitted on all digital systems in these bands or only on those where the licensee is authorized for a protected service area, the Alliance urges the Commission to resolve that issue as expeditiously as possible so that compliance with station identification requirements may be maximized regardless of the technology deployed.

Sincerely,

Mark E. Crosby

Mark E. Crosby
President/CEO

MEC:

cc: Stu Overby, Motorola Solutions, Inc.
Chris Imlay, Kenwood USA