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November 6, 2012

**VIA ELECTRONIC FILING**

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

**Re: WT Docket No. 05-62  
WT Docket No. 02-55  
RM-11572  
WP Docket No. 07-100  
WT Docket No. 99-87**

**Ex Parte Presentation**

Dear Ms. Dortch:

On November 2, 2012, Mark E. Crosby, President and CEO, Enterprise Wireless Alliance (“EWA”) and undersigned counsel for EWA, met with the staff of the Public Safety and Homeland Security Bureau and the Wireless Telecommunications Bureau listed below. The parties discussed the following FCC proceedings:

WT Docket No. 05-62/WT Docket No. 02-55: EWA urged the FCC to act on the Joint Petition for Clarification or, In the Alternative, for Limited Reconsideration filed on December 17, 2008, by EWA and Sprint Nextel Corporation. EWA explained that the freeze is no longer necessary, as Sprint has determined that it does not need additional 900 MHz spectrum to meet its 800 MHz rebanding obligations. EWA also emphasized the hardship imposed on Industrial/Business licensees that are required to operate pursuant to Special Temporary Authorizations that must be renewed every six months and that do not provide the certainty most organizations require before investing in costly equipment.

RM-11572: EWA requested the FCC to adopt a Notice of Proposed Rulemaking in response to EWA’s Petition for Rulemaking proposing rule modifications that would permit the licensing of interstitial, full-power, 12.5 kHz channels in the 800 MHz band. EWA noted that the record in response to the FCC’s request for comment on the Petition confirmed broad land

mobile support for the proposed rule change, which would provide additional opportunities for deployment of digital systems in this band.

WP Docket No. 07-100: EWA urged the FCC to finalize this proceeding by adopting rules consistent with the positions endorsed by the Land Mobile Communications Council. In particular, EWA noted that an increasing number of systems operating on Part 90 spectrum are converting from analog to digital technology and that the current rules do not provide for station identification using digital emissions. EWA urged the FCC to address this issue promptly, consistent with the record in this proceeding, including the Request for Temporary Waiver of Section 90.425 filed by Kenwood USA Corporation.

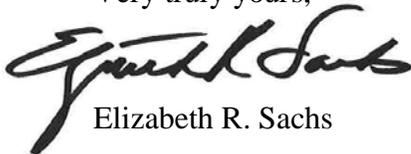
WT Docket No. 99-87: EWA requested clarification about the treatment of licenses that have not satisfied their narrowband requirements as of January 1, 2013, including how they are to be considered for purposes of coordinating applications for properly licensed systems. EWA also requested clarification regarding narrowbanding applications that are in the coordination process but not yet filed with the FCC as of January 1, 2013.

PSCC Letter Regarding Coordination of Public Safety VHF TDMA Applications: EWA discussed the Public Safety Communications Council ("PSCC") position regarding coordination of fixed stations seeking VHF channels for use in a TDMA system, as well as issues related generally to the coordination of digital systems on Part 90 frequencies.

470-512 MHz Band (T-Band) Freeze: EWA repeated its concerns about the FCC's freeze on industrial, business, and commercial licensees operating on T-band spectrum identified in Section 90.303 of the FCC Rules, even though the 2012 Spectrum Act calls for auctioning only spectrum "currently used by public safety eligibles" and does not allow auction funds to be used for the relocation of non-public safety systems. EWA emphasized the hardship this premature and overly inclusive freeze is imposing on these licensees and the absence of comparable Part 90 spectrum to which these systems could be relocated.

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: Roger Noel, WTB (via email)  
Scot Stone, WTB (via email)  
Michael Wilhelm, PSHSB (via email)  
Brian Marenco, PSHSB (via email)