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December 18, 2013

**VIA ELECTRONIC FILING**

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

**Re: WT Docket No. 02-55  
RM-11572  
WP Docket No. 07-100  
WT Docket No. 99-87  
PS Docket No. 13-42  
PS Docket No. 13-229**

**Ex Parte Presentation**

Dear Ms. Dortch:

On December 16, 2013, 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. 02-55: EWA discussed the efforts of certain Frequency Advisory Committees (“FACs”) within the Land Mobile Communications Council (“LMCC”) to implement a Memorandum of Agreement (“MOA”) regarding pre-filing procedures for 800 MHz Expansion Band and Guard Band applicants. The MOA is intended to prevent the filing of mutually exclusive applications for this spectrum with the FCC.

RM-11572: EWA requested the status of 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 discussed its recent Comments and Reply Comments in this proceeding. Consistent with those filings, the Alliance urged the FCC to revisit the definition of Critical Infrastructure Industries (“CII”) as applied to this band. It explained that many large enterprise organizations could use this broadband spectrum productively, but do not meet the statutory CII definition that was adopted some time ago in the context of an entirely different spectrum allocation. EWA also explained why it and other qualified FACs should be permitted to coordinate applicants for this band, consistent with whatever technical standards the FCC adopts.

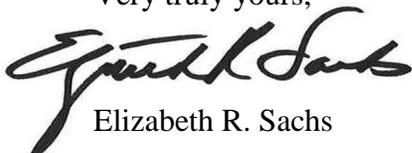
WT Docket No. 99-87: EWA discussed the possibility of establishing criteria for entities seeking long-term or even perpetual waivers of the FCC’s narrowbanding requirements, but also acknowledged the difficulty of defining criteria that would not compromise the narrowbanding effort or divert excessive Bureau resources to evaluating such requests.

PS Docket No. 13-42: EWA requested a status update regarding any potential changes to the T-Band freeze and was advised that the Bureaus are reviewing the issue.

PS Docket No. 13-229: The Alliance expressed its agreement with the FCC’s efforts to find a permanent spectrum home for vehicular repeaters, recognizing the technical limitations of this equipment. It explained that EWA was reviewing the FCC’s recommended solution to this long-standing issue.

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: Scot Stone, WTB (via email)  
David Furth, PSHSB (via email)  
Michael Wilhelm, PSHSB (via email)  
Brian Marenco, PSHSB (via email)  
John Evanoff, PSHSB (via email)