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July 29, 2021

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

RE: WP Docket No. 15-32  
*Ex Parte* Letter

Dear Ms. Dortch:

The Enterprise Wireless Alliance (“EWA”) is pleased that the 800 MHz rebanding proceeding is now complete<sup>1</sup> and that the Federal Communications Commission (“FCC”) has lifted freezes that will allow additional spectrum in this band to be utilized.<sup>2</sup> There is one further step EWA recommends that will permit the full potential of the band to be realized. The FCC adopted rules in 2018 authorizing the creation of 12.5 kHz bandwidth interstitial channels in the 809-817/854-862 MHz band.<sup>3</sup> It adopted an Order on Reconsideration in 2020 that modified and clarified the technical rules for coordinating applications for those interstitial channels.<sup>4</sup> Thus, while the rules are in place to license systems on those channels, no filing window for accepting applications has been announced pending completion of 800 MHz rebanding.

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<sup>1</sup> Notice of Program Completion and Request for Authorization to Terminate Program Agreements, WT Docket No. 02-55 (filed Mar. 5, 2021).

<sup>2</sup> Public Safety and Homeland Security Bureau and Wireless Telecommunications Bureau Announce the Post-Rebanding Availability for Licensing of Additional Sprint-Vacated, Expansion Band, and Guard Band Channels in the 800 MHz Band, WT Docket No. 02-55, *Public Notice*, DA 21-706 (rel. Jun. 16, 2021) (“Post-Rebanding PN”).

<sup>3</sup> *Creation of Interstitial 12.5 Kilohertz Channels in the 800 MHz Band Between 809-817/854-862 MHz; Amendment of Part 90 of the Commission’s Rules to Improve Access to Private Land Mobile Radio Spectrum; Land Mobile Communications Council Petition for Rulemaking Regarding Interim Eligibility for 800 MHz Expansion Band and Guard Band Frequencies; Petition for Rulemaking Regarding Conditional Licensing Authority Above 470 MHz*, Report and Order and Order, 33 FCC Rcd 10222 (2018).

<sup>4</sup> *Creation of Interstitial 12.5 Kilohertz Channels in the 800 MHz Band Between 809-817/854-862 MHz*, Order on Reconsideration, 35 FCC Rcd 4940 (2020).

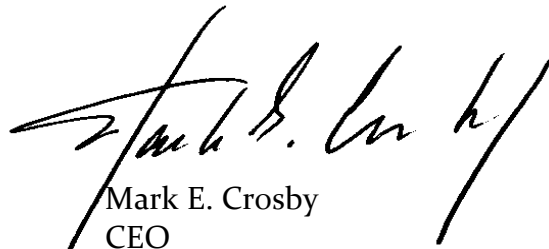
The Post-Rebanding PN announced that the FCC would begin accepting applications for 800 MHz 25 kHz bandwidth channels on August 14, 2021. Those applications will have been coordinated by FCC-certified Frequency Advisory Committees (“FACs”), thereby ensuring that they meet all FCC requirements and are not mutually exclusive with other applications. After that date, the 25 kHz bandwidth spectrum environment in this band largely will be settled and the introduction of systems on 12.5 kHz channels may commence.

EWA urges the FCC to issue a Public Notice announcing a date as soon as possible after August 14, 2021, when it will begin accepting applications for 800 MHz 12.5 kHz bandwidth channels. The FACs that coordinate 800 MHz spectrum have determined that no special coordination process will be required to handle these applications, because it is not anticipated that they will be geographically concentrated. The standard frequency coordination process is well-equipped to handle any possible instances of mutual exclusivity, as it does today in the rare instances when those situations arise.

Please feel free to contact me if you have any questions or comments.

Sincerely,

**ENTERPRISE WIRELESS ALLIANCE**



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