



**Recommendation WG 03.14.001  
(Replaces WG 03.89.018)**

**PCN DISTRIBUTION  
and  
PROTECTION AGENT NOTIFICATION**

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# RECOMMENDATION

## **I. PCN Distribution**

Background: Section 101.103(d) (1) lists parties to receive frequency coordination.

*(1)... Proposed frequency usage must be prior coordinated with existing licensees, permittees and applicants in the area, and other applicants with previously filed applications, whose facilities could affect or be affected by the new proposal in terms of frequency interference on active channels, applied-for channels, or channels coordinated for future growth.*

NSMA recommendation WG3.89.018 added another group to the required notification list; “parties with previously coordinated (but yet to be filed) proposals.” This earlier recommendation however fails to include a requirement to notify the party’s frequency coordinator.

One of the main purposes of frequency coordination is to provide interference protection for systems until applications have been filed with the FCC. As such it should be emphasized that PCNs are required to be sent not only to owners of proposed systems but also to coordination agents that have proposed PCNs in an area. This is necessary since the coordinator acts as the de-facto protection agent for their client’s coordinated paths before applications have been filed with the FCC.

### Recommendations

1. In addition to the parties specified in 101.103(d)(1) Prior Coordination Notices should be sent to:

- a. Parties with previously coordinated (but not yet filed) proposals and to
  - b. Coordination agents that have active PCN's (coordinated within the last six months but yet to be filed), in the same frequency bands, and within the coordination contour of the proposed system.
2. After filing FCC applications the licensee is responsible for reviewing future PCNs or designating a Protection Agent.

## **II. Protection Agent Notification**

Background: Section 101.103(d) (2) (x) of the FCC Rules states that licensees should specify the name of their designated representative or protection agent to other licensees:

*(x) Applicants, permittees and licensees should supply to all other applicants, permittees and licensees within their areas of operations, the name, address and telephone number of their coordination representatives.*

However, in practice this is not a very workable situation. The list of licensees to notify will change on a daily basis and it is simply impractical for licensees to keep track of these changes or provide this information to all other entities. Generally it is the designated protection agent that will notify other coordinators of an existing protection agreement on behalf of their clients. Since notification procedures are not specified by the FCC the following guidelines are established by NSMA for Coordinators/Protection Agents in their assumed role.

## Recommendations

1. Protection agent notifications should specify the protection client by licensee name and FCC Registration Number (if available).
2. Notifications may specify a contract length. If no specific contract length is indicated, coverage will continue with the protection agent until notification to terminate or an agent change request is received.
3. Notifications should specify delivery preferences for PCN notices. This information should include the protection agent delivery information and whether or not the licensee wants to continue to receive a copy of the notices.
4. Notifications should be made to all known coordinators determined by who has sent a PCN to the protection agent or licensee during the previous 12 month period.
5. If the current protection agent drops coverage for a licensee or if the protection contract is canceled by the licensee, the protection agent should provide their former client a list of coordinators requiring notification or alternatively notify other coordinators about this change.
6. Notifications of case issues and clearance from a protection agent to the coordinator of a specific PCN should identify each licensee cleared by the agent and any specific licensees with potential issues.