

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
The Development of Operational, Technical and Spectrum Requirements for Meeting Federal, State and Local Public Safety Communications Requirements Through the Year 2010	)	WT Docket 96-86

**COMMENTS OF THE NATIONAL PUBLIC SAFETY TELECOMMUNICATIONS  
COUNCIL**

The National Public Safety Telecommunications Council (NPSTC) submits these comments in response to the Commission's Eighth Notice of Proposed Rulemaking (NPRM) in the above proceeding. The NPRM addresses the structure of that part of the 700 MHz band dedicated to public safety communications services.<sup>1</sup> The NPRM seeks to determine whether the Commission should modify the public safety portion of the 700 MHz band to accommodate broadband communications, and, if so, how. It describes three specific proposals, one that is recommended by NPSTC.

NPSTC's recommendation flows from two premises. First, it is vital that the Regional Planning Committees (RPCs), established by the Commission to administer the 700 MHz public safety band, be given authority to determine how best to meet the broadband and wideband requirements of local agencies within their own regions. The character of broadband and wideband applications, the capacity needed to support these uses, and the fact that there are more agencies and requirements than the available spectrum can support, means that coordination is

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<sup>1</sup> In the Matter of the Development of Operational, Technical and Spectrum Requirements for Meeting Federal, State and Local Public Safety Communications Requirements Through the Year 2010, *Eighth Notice of Proposed Rulemaking*, WT Docket 96-86, FCC 06-34 (March 21, 2006).

necessary to strike a balance among competing demands. Providing public safety services is a local and state responsibility and therefore the administration of the critical communications resources to support these operations should coincide with these responsibilities. We believe that wherever an RPC is organized and functioning, the RPC is in the best position to determine and coordinate local and state needs.

Second, NPSTC's recommendation is shaped by the work completed. Much planning and effort has already been committed on the part of local and state public safety agencies in the 700 MHz band. It is not a reasonable alternative to forfeit this effort and essentially start over. Because regional administration of public safety spectrum improves operations and the extensive work in the 700 MHz band cannot be abandoned, NPSTC recommends that the Commission draw from the current reserve, general use, and interoperability wideband channels and restructure the 700 MHz band consistent with its proposal in the NPRM. This will afford local agencies the flexibility to select, to the extent spectrum is available, the wideband and/or broadband applications to meet their needs.

NPSTC's recommendation reflects its analysis of the proposals submitted in this docket. We have examined how each proposal allows public safety agencies, in coordination with the RPCs, to operate these channels, the broadband and wideband opportunities provided, and the costs and disruption that would ensue by any changes to the current band structure. NPSTC's commitment to examine any legitimate proposal that will enhance public safety communications in the 700 MHz band, guided by these factors, remains in place. This commitment is constrained only by time, with the need to bring clarity to the rules, we caution that extended debate will dilute the enormous momentum now directed toward placing the 700 MHz channels in operation.

We therefore urge that in the very near future the Commission must make a decision addressing the structure of public safety's 700 MHz band.

### **The National Public Safety Telecommunications Council**

NPSTC serves both as a resource and advocate for public safety organizations in the United States on matters relating to public safety telecommunications. NPSTC is a federation of public safety organizations dedicated to encouraging and facilitating, through its collective voice, the implementation of the Public Safety Wireless Advisory Committee (PSWAC) and the 700 MHz Public Safety National Coordination Committee (NCC) recommendations. NPSTC explores technologies and public policy involving public safety agencies, analyzes the ramifications of particular issues, and submits comments to governmental bodies with the objective of furthering public safety communications worldwide. NPSTC serves as a standing forum for the exchange of ideas and information for effective public safety telecommunications.

The following 13 organizations participate in NPSTC:

American Association of State Highway and Transportation Officials

American Radio Relay League

American Red Cross

Association of Public-Safety Communications Officials-International

Forestry Conservation Communications Association

International Association of Chiefs of Police

International Association of Emergency Managers

International Association of Fire Chiefs

International Association of Fish and Wildlife Agencies

International Municipal Signal Association

National Association of State Emergency Medical Services Officials

National Association of State Telecommunications Directors

National Association of State Foresters

Several federal agencies are liaison members of NPSTC. These include the Department of Agriculture, Department of Homeland Security (SAFECOM Program and the Federal Emergency Management Agency), Department of Commerce (National Telecommunications and Information Administration), Department of the Interior, and the Department of Justice (National Institute of Justice, CommTech Program).

### **The Role of the Regional Planning Committees Is Vital**

The 700 MHz public safety band supports local and state public safety agency operations. Each agency faces unique demands and operates in varying environments. The varied circumstances of these agencies cannot be reduced to a standardized format; to do so undermines effective emergency response. The Commission's decision to create the Regional Planning Committees (RPCs) recognizes that public safety services are largely committed to local authorities and that these officials need a flexibility that allow wireless communications networks to be responsive to local and state demands. The RPCs provide for the participation of local agencies within the parameters of the Commission's rules and policies to determine how best to deliver wireless communications.

There are varying demands across agencies and regions for broadband/wideband applications. The Commission correctly notes that wideband provides greater geographic coverage, while broadband provides higher data rates. NPSTC believes it important to recognize varying requirements and capabilities, and that local and state public safety officials, working

through the RPCs, are in the best position to establish how the available radio spectrum can best support local needs.

The 700 MHz RPCs comprehend and accommodate the varying environments. The objective to shape wireless resources responsive to local demands requires technical expertise, knowledge of the needs and users, and the ability to balance how a limited resource is employed. Possessing the necessary skill, the RPCs, with the involvement of local and state agencies, are dedicated to examining the range of requirements and agencies that overwhelm the amount of spectrum available and to do so in a fair and open process. The RPCs are in a position to prepare and implement a plan and coordinate operations, which we believe underlies the most effective means to provide wideband and broadband applications in the 700 MHz band. Significantly, the RPCs seek resolution through building a consensus among users. NPSTC believes that it would be an error to pursue the contrary, to dictate through a universal rule the precise parameters of applications and technologies, broadband or wideband. It will undermine local participation and accountability in a critical resource of public safety.

NPSTC understands there are circumstances where RPCs are constrained by lack of membership and other factors that present administrative and substantive challenges to effective use of this spectrum. These circumstances present challenges not only to agencies within a region, but to those in adjacent areas where coordination must take place. Moreover, as our Comments recognize, the coordination of narrowband voice, wideband, and broadband operations impose a level of complexity.

To alleviate these challenges and to promote all the opportunities this band segment presents, NPSTC commits to seeking resources to formalize its National Plan Oversight Committee (NPOC). NPOC was initially established during the Commission's Advisory

Committee, the Public Safety National Coordination Committee (NCC), to provide dispute resolution and expertise to RPCs and participating agencies. To further 700 MHz broadband and wideband, as well as for effective 700 MHz administration, NPOC will provide guidance through resource materials and technical expertise to assist RPCs and participating agencies in preparing regional plans, coordinating with other regions, examining technology alternatives, and analyzing how the various applications can coexist within the band. NPOC will promote effective wideband and/or broadband use within a region that will coexist with narrowband voice operations and protect operations in adjacent regions. NPSTC commits, in cooperation with the Commission and interested parties, to pursue resources for NPOC to carry out these efforts.

### **The Work Completed**

The 700 MHz public safety band already reflects the work of the RPCs. In the nearly 10 years since the Commission allocated the 24 MHz from television broadcast services to public safety communications services<sup>2</sup>, much work has been completed by the RPCs and their region's public safety agencies. The work has encompassed RF expertise, knowledge of the Commission's rules, comprehension of each agency's requirements, and the credibility to promote a resolution among competitors. Every state has now received a statewide license. With assignments in place in many regions, work has commenced by agencies and manufacturers to design and construct systems. Congress' establishment of a definitive date for the completion of the broadcast transition has spurred this investment even more.

The NCC spent enormous time and energy, drawing on the expertise of the many interests dedicated to improve public safety communications, to recommend to the Commission the parameters as to how the 700 MHz narrowband voice channels should be used. That effort

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<sup>2</sup> See 47 U.S.C. § 337(a)(1); Reallocation of Television Channels 60-69, the 746-806 MHz Band, ET Docket No. 97-157, *Report and Order*, 12 FCC Rcd 22953 (1997) (*Reallocation Report and Order*).

culminated in a Commission rulemaking and promulgation of rules that have now been in place for several years. This effort establishes the underlying premise for the extensive planning now completed by the RPCs and participating agencies.

NPSTC has surveyed public agencies, manufacturers, and other interests that service public safety agencies to discern the effort and investment made in reliance of the current band structure. We also examined the elements associated with changing the current narrowband voice channel location. Notably, many manufacturers have pursued the opportunity to build 700 MHz capability into 800 MHz radios, an action intended to save equipment costs and promote interoperability across these bands. Numerous agencies across the country have already taken advantage of this opportunity. Manufacturers advise us that the number of mobile/portable dual band 700/800 MHz radios delivered to public safety agencies currently exceeds 600,000. Any changes in location of the narrowband channels within the 700 MHz band would require these agencies to incur the expense of software development and procurement to reprogram each radio. The software would instruct the radio which specific transmit/receive frequency is associated with a given channel number. Each radio would need to be taken out of service temporarily so the new software could be programmed.

Specific contracts already in place relating to 700 MHz systems include the State of New York Statewide Wireless Network; the Las Vegas Metropolitan Police Department; the City of Milwaukee; the Commonwealth of Virginia; Oakland County, Michigan; and Lancaster County, Pennsylvania. Additionally, as the Commission's records indicate, there are three waiver requests currently pending, from the National Capital Region<sup>3</sup>, the New York State Statewide

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<sup>3</sup> Request for Waiver submitted by Robert L. LeGrande II, Deputy Chief Technology Officer of the District of Columbia on behalf of the National Capital Region to Marlene H. Dortch, Secretary of the Commission, dated May 12, 2006.

Wireless Network<sup>4</sup>, Hennepin and Washington County, Minnesota, and the Metropolitan Emergency Services Board of St. Paul<sup>5</sup>, seeking use of the 700 MHz band for various applications. Each of these applications represents enormous resource commitments and the exigency related to the 700 MHz channels.

In addition, the current 700 MHz structure has entailed significant planning. This includes developing the Computer Assisted Pre-Coordination Resource and Database System (CAPRAD) to assist RPCs in the efficient selection of frequencies. That software would need to be modified and the 700 MHz planning already completed in a number of regions would need to be redone.

NPSTC weighed these circumstances against proposals that would relocate the narrowband voice channels. NPSTC analysis recognized that benefits would accrue that would afford some additional spectrum and flexibility. Both the technical evaluation and the balancing of benefits against the disruption were vexing challenges.

NPSTC continues to support the Commission's "tentative conclusion" that it not alter the current narrowband channel allotments. Such changes at this stage would place substantial burdens on local government, strand investment, and delay access to the 700 MHz band. None of this work to date can be recouped; any delay means that the return on investment-improved public safety communications is postponed. Nor is it reasonable, in view of the limited resources that pervade public agencies, to now replicate this very same effort plus pay for reprogramming

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<sup>4</sup> *In the Matter of Request for Waiver of the State of New York of the Television Interference Rules to Implement a 700 MHz Public Safety Communications System*, WT Docket No. 06-18 (2006).

<sup>5</sup> *Letter of Sheriff Patrick D. McGowan of Hennepin County to Catherine Seidel, Acting Chief, Wireless Telecommunications Bureau, Federal Communications Commission*, dated April 14, 2006, contained in WT Dockets 96-86 and 02-378.

costs for a different band plan. Agencies simply cannot duplicate the enormous commitment of public monies that has already been made.

### **NPSTC's Proposal Recognizes the Realities of Public Safety Communications**

NPSTC recognizes that providing for both broadband and wideband applications in the 700 MHz band and allowing the RPCs to determine on a regional level the degree of wideband/broadband use imposes a constraint on restructuring the band. NPSTC sincerely believes that the relief the 700 MHz narrowband voice channels will provide is so critical and the ability of local officials, through the RPCs, to set the mix of broadband/wideband to respond to local operational demands so important, as to outweigh the benefits that may flow from a broader restructuring.

NPSTC's position stems from the reality that the current 700 MHz allocation, as vital as it is and no matter what its structure, is not adequate to meet public safety's narrowband, broadband, and wideband voice and data requirements. Efforts to shoehorn broadband and wideband channels present the real risk of compromising work already completed on the enormously important narrowband voice channels. Neither 700 MHz, nor the opportunities provided by 4.9 GHz, because of its propagation characteristics, both of which are important commitments, meet public safety's overall wideband and broadband requirements. The findings and recommendations of the Commission's and the National Telecommunications Information Administration's Public Safety Wireless Advisory Committee (PSWAC), which NPSTC believes remain relevant, affirm this view<sup>6</sup>. Any opportunity to examine a broader restructuring in the 700 MHz band depends on an appreciable additional allocation to public safety.

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<sup>6</sup> *Final Report of the Public Safety Wireless Advisory Committee* (September 11, 1996), at [http://www.ntia.doc.gov/osmhome/pubsafe/PSWAC\\_AL.pdf](http://www.ntia.doc.gov/osmhome/pubsafe/PSWAC_AL.pdf).

NPSTC urges the Commission to establish the parameters of wideband and broadband use in the 700 MHz band while affording the RPCs the flexibility to choose the structure that best responds to a region's needs. Not affording this flexibility is not a realistic alternative as optimal use of the band will be thwarted. NPSTC commits to pursuing resources that will promote each RPC's ability to make reasoned decisions with participating agencies as to how the band should best meet local requirements.

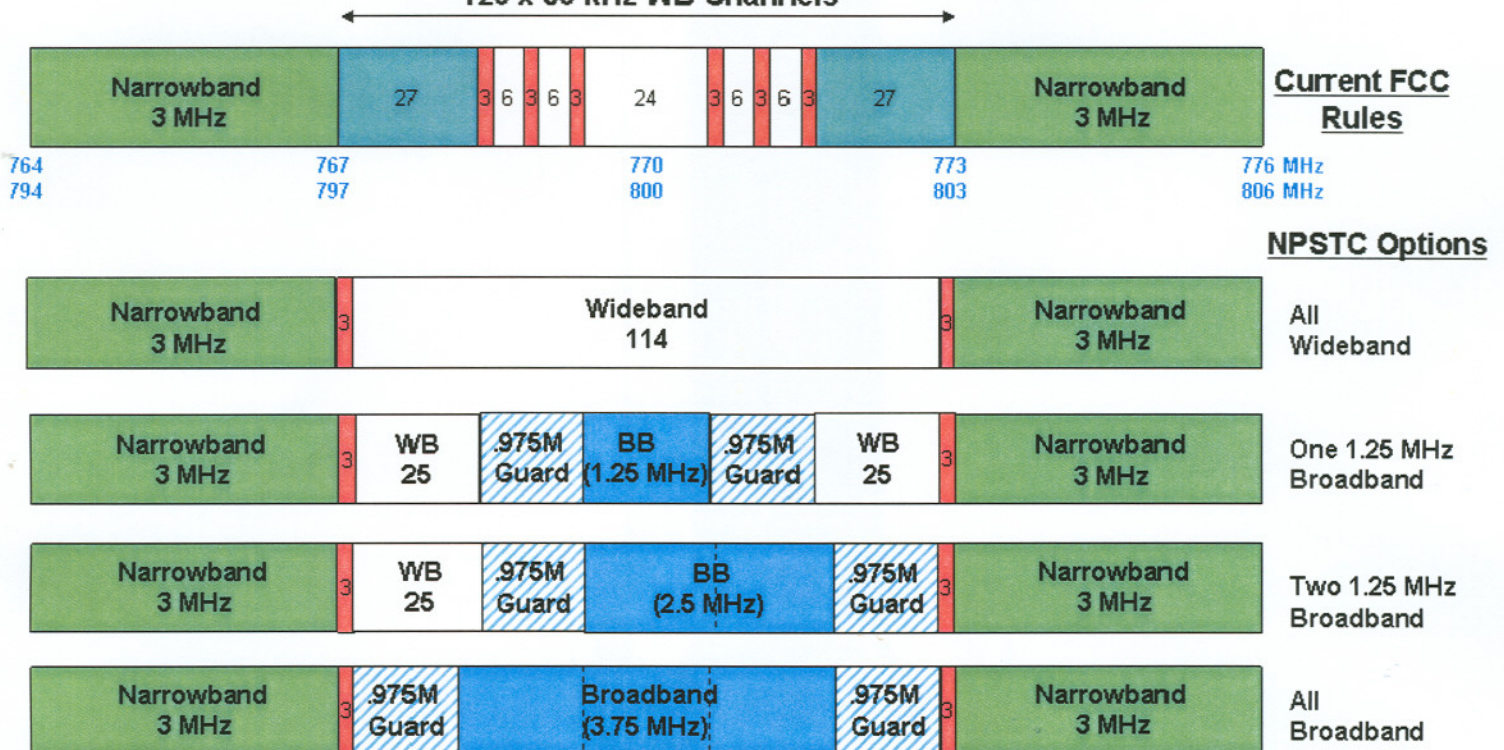
### **NPSTC's Band Proposal**

NPSTC believes it important to restructure the 700 MHz band to provide both broadband and wideband capabilities to public safety. It believes that there are substantial demands for both applications. The restructuring should not be devoted solely to broadband nor should only one technology be capable of operating in the band. The RPCs should be provided the flexibility to establish the operational levels necessary to meet the region's requirements within the spectrum environment of the band segment. NPSTC thinks that the RPCs have the expertise and relationships to facilitate a consensus not only within their regions but also with adjacent regions.

NPSTC's analysis, from which its recommendations flow, evolves around the realities not only of the public safety sector, but of wireless communications in general. The realities include the propagation characteristics of the band, the operations of adjacent commercial users, the nature of broadband and wideband as compared to narrowband voice, and public safety's historic challenge of having more users than available spectrum. These factors entail in varying degrees the need to manage and coordinate; specifically coordinating operations and using both noise and interference management techniques. NPSTC's analysis has sought to balance the associated costs of management and coordination with the financial constraints of government agencies.

NPSTC recommends that the current reserve, general use, and interoperability wideband channels be combined to provide wideband and/or broadband applications. NPSTC's analysis provides a .975 MHz internal band guard band between voice and broadband channels. This model seeks to provide the flexibility to accommodate several scenarios for both wideband and broadband applications. Set forth below is the current 700 MHz public safety band and NPSTC's proposal, including four scenarios (all wideband, one 1.25 MHz broadband channel, two 1.25 MHz channels, and all broadband), representing the flexibility and choice afforded:

**120 x 50 kHz WB Channels**



- Narrowband Channels
- Wideband Reserve
- Wideband Interoperability
- Wideband Channels
- Optional Broadband
- Guard-band for Broadband

Placement to be Determined

Note: Location of Wideband Interoperability Channels is Illustrative Only, Actual

Licensees, in coordination with the RPCs, will have the opportunity to dedicate the spectrum for general wideband use or deploy a combination of wideband and broadband operations. For the wideband use scenario, NPSTC recommends that 120 wideband channels at 50 kHz be made available with six of those 120 channels designated for wideband interoperability purposes. As in the current rules, these 50 kHz channels could also be aggregated to form 150-kHz-wide channels. In the alternative, licensees could aggregate wideband channels from the 50 kHz wideband “building blocks” to form one, two, or three 1.25 MHz broadband channels. These 1.25 MHz channels can in turn be aggregated to form channels up to 3.75 MHz wide, centered at 770/800 MHz and located within the 767-773/797-803 MHz spectrum block.

NPSTC believes the proposal provides agencies a means to obtain broadband or wideband capability in varying environments to the extent the available spectrum allows. Technologies exist in the market that respond to broadband and wideband needs and can operate within the parameters of the proposal.

As noted, the Counties of Hennepin and Washington, Minnesota, and the Metropolitan Emergency Services Board of St. Paul, filed a waiver request to permit the licensing and use of wideband channels designated for interoperability in the 700 MHz band<sup>7</sup>. The proposal would bring about a wideband wireless data communications system that will achieve critical interoperability among these agencies’ first responders and provide capacity for daily operations. A vendor has been identified to provide wideband applications. NPSTC’s review indicates that this waiver request falls within the parameters of the NPSTC proposal and reflects the

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<sup>7</sup> *Letter of Sheriff Patrick D. McGowan of Hennepin County to Catherine Seidel, Acting Chief, Wireless Telecommunications Bureau, Federal Communications Commission, dated April 14, 2006, contained in WT Dockets 96-86 and 02-378.*

opportunity that will be afforded all agencies in administering the 700 MHz wideband and broadband channels.

### **Guard Bands, Coordination, and Management**

The Commission asks several questions regarding the need for and extent of a guard band between narrowband voice and broadband segments. Guard bands, coordination, and noise/interference management are used today in public safety communications to promote optimal use of the spectrum. As noted, our analysis begins with the realities of coexisting with adjacent commercial users and the standard the Commission has set for these operations and how that standard directly affects public safety operations within the band. That several agencies must be able to use the band for varying applications is part of the analysis.

There is a high probability that both wideband and broadband systems will interfere with narrowband operations without a guard band for protection. It is certain that the guard band requirement can be minimized if all wideband/broadband radio sites could be co-located with narrowband radio sites. This, however, is not a practical solution given the diversity of user agencies and the differing coverage results of broadband data compared to that of narrowband voice. NPSTC's analysis of the environment reflects the need for a guard band capability to coordinate operations and, in some circumstances, implementing management techniques to provide the most effective and efficient use of the spectrum.

The only clearly applicable guidance for broadband emissions levels currently within Section 27.53 of the Commission's rules specifies that levels into the public safety 700 MHz allocation must not exceed -46 dBm/6.25 kHz<sup>8</sup> levels. The rule sets an underlying premise

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<sup>8</sup> With reasonable site isolation (e.g. 75-dB), these emissions levels are already at least 3-dB above the noise floor of narrowband equipment.

regarding not only how public safety operations must accommodate adjacent commercial users, but operations within the band segment, as equipment must accommodate both uses.

The attenuation of broadband emissions to these levels is practically attained through the Commission's designation of the guard band spectrum located immediately adjacent to the public safety allocation. Therefore it is not unexpected that a minimum guard band of approximately 1 MHz would be required for actual deployment of broadband technology while meeting these specified levels within the public safety 700 MHz narrowband allocations. Additionally, as with addressing adjacent commercial users, we can envision circumstances requiring additional filtering on base transmitters. We anticipate that as part of this proceeding the Commission will seek comment on the appropriate emissions specifications for broadband operations within the band.

This interference potential is similar to the interference experienced in the 800 MHz band caused by Commercial Mobile Radio Service (CMRS) systems and creating the now classic near-far interference. Broadband systems, to achieve high data throughputs, need more sites than the typical narrowband voice system. Two leading broadband vendors, Lucent and Motorola, have expressed concern regarding this type of interference absent guard band protection.<sup>9</sup> Significantly, the impact of this "interference" is very difficult to define, since it can manifest in many ways such as degradation in performance, coverage, or quality of service. Further, there is an intrinsic challenge in discerning what levels of interference are acceptable. These are difficult questions, since in spectrally challenged areas of the country, interference limited operations are and will continue to be necessary to meet public safety's

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<sup>9</sup> *Ex Parte* Letter of Michael T. McMenamin, Lucent Technologies, to Marlene H. Dortch, Secretary of the Commission, dated December 2, 2005 in WT Dockets 96-86 and 05-157 and *Ex Parte* Letter from Steve B. Sharkey, Director of Spectrum Structure and Technology, Motorola, Inc., to Marlene H. Dortch, Secretary of the Commission, dated October 27, 2005 in WT Dockets 96-86 and 05-157.

basic capacity needs. In most markets, public safety systems are designed as noise-limited rather than interference-limited systems. Noise-limited systems have fewer sites and are generally less costly.

In this context, it is possible to narrow the guard bands by requiring tighter filtering of the broadband out of band emissions (OOBE). There are practical limits to designing filters to do this. It would also increase costs of both the subscriber and infrastructure equipment, with the risk that system costs would be too high for public safety to implement. The actual operational gains achieved with regard to these costs are not only complex, but also non-homogeneous across the nation as related to public safety 700 MHz deployments. Yet, there may be circumstances where some additional filtering on broadband base stations may be necessary to minimize interference and obtain optimal use of the band segment.

NPSTC's premise is that proper frequency coordination is more effective and much less costly than applying overly stringent standards to equipment. Stringent equipment standards will place the acquisition of the new equipment needed to use the 700 MHz out of reach of many public safety budgets. As our comments reflect, to obtain optimal use of the spectrum, there will be situations where coordination will be supplemented by system deployment, equipment specifications, and other management techniques such as filters and antennas to minimize interference.

To foster an understanding of what will be necessary, NPSTC commits to pursuing resources for the testing of equipment in the scenarios anticipated. By working with public agencies, manufacturers, and other interests, NPSTC will facilitate a cooperative effort to examine and measure the interference circumstances in the several environments encompassing narrowband voice, broadband, wideband, and interoperability channels. We believe that such

an effort is necessary to comprehend and balance the costs associated with various techniques and the resource constraints of public safety agencies.

With this testing project, and provision of resources and expertise to the RPCs, obtaining the most optimal use of the spectrum can be achieved by having the RPCs maintain a critical role in the deployment of narrowband, wideband, and broadband 700 MHz technologies. Such coordination is even more important in environments deploying mixed systems within a region. While encompassing a level of complexity, the RPC role will support maximum spectrum flexibility and diverse technology coexistence, which are vital elements to productive use of the 700 MHz broadband and wideband channels.

NPSTC examined several alternatives to minimize the guard band and found that channel plans allowing for one additional broadband channel still required a guard band between narrowband and broadband. Yet the additional channel came at a cost of moving the narrowband voice channels to one end of the band and broadband/wideband to the other. As noted, this will be very disruptive to current regional plans encompassing the narrowband voice channels and will forfeit the costs already incurred by many agencies. The benefit gained will not offset the disruption the restructuring would create.

Notably, the larger guard band required for voice protection from broadband operations should not necessarily be viewed as a "waste" of spectrum. Choosing among the various technologies and applications in a spectrum-constrained environment requires a balance that we believe the RPCs are in the best position to achieve. Even with these guard bands, broadband technologies such as cdma2000/1xEVDO could allow for very high capacity operations, employing the equivalent of as many as nine 1.25 MHz channels at each site location (three channels, reused over three sectors). Even without consideration of sector reuse at the site, CDMA allows for as much as 62.5 percent of the total capacity of the entire

wideband allocation to be available at every site, as compared to 14 percent of the wideband Orthogonal Frequency Division Multiplexing (OFDM) spectrum deployed in a typical seven cell reuse pattern. Yet, with the broadband guard band, deployment of two 1.25 MHz channels consumes 89 of the 50 kHz channels that would be available for wideband operations. The RPCs and the participating agencies are in the best position to strike the balance reflecting the region's needs.

### **Wideband and Broadband Interoperability**

NPSTC's position on whether there should be wideband interoperability channels and whether a standard should be imposed is based on several factors. The first is the general premise that the RPCs be given substantial discretion to mold the broadband/wideband channels to the region's needs. Technology advances in broadband and wideband that have taken place since the issue of interoperability standards was first presented has also influenced the analysis. There is also a concern that agencies, which would not ordinarily have a need for wideband interoperability, of which NPSTC believes there are many, not have to pay the associated costs if each radio must contain standardized interoperability capability.

In contrast to when the debate first commenced in the late 1990s, the record reflects several technologies and applications supporting wideband. NPSTC's proposed band plan seeks to capitalize on these advances and provide agencies, under the leadership of the RPCs, channels for general use, while providing interoperability capability for agencies needing it. NPSTC believes it counterproductive to require each radio to contain interoperability capability; it would impose a cost on the users who have no wideband interoperability needs. Such costs are more fairly borne by agencies requiring wideband interoperability.

NPSTC believes that the wideband environment differs substantially from that of narrowband voice where an interoperability standard is mandated. There is a much greater

need to speak to personnel of another agency at both the small and large incident as well as in daily operations, than to transmit data and information. Additionally, there will continue to be a large number of agencies whose only mode is voice communications. There will remain a need, however, particularly at a large incident, where data and information is critical and agencies need capability to share it with other responders.

The Commission's rules should recognize these contrasts between voice and wideband. As noted, NPSTC recommends that within the wideband segment of its proposal, interoperability channels be designated. For agencies that need to ensure interoperability, radios should be built to the TIA-902 Scalable Adaptive Modulation (SAM) standard. There should be no mandate that all radios using the 700 MHz broadband/wideband channels contain this interoperability capability, only those agencies using the specified interoperability channels.

NPSTC does not believe that a record exists to support the establishment of a standard, or standards, for broadband interoperability. There are ongoing efforts, including that of Project MESA,<sup>10</sup> devoted to examining high-mobility wireless broadband data specifications, standards, and capabilities. These efforts are focused on the public safety environment, both ad hoc and daily operations. The objective is the development and coordination of necessary standards to assure quality of service and a competitive equipment market. NPSTC's analysis of these efforts indicates that definitive recommendations have yet to emerge.

## **Conclusion**

The Commission's effort to update the current 700 MHz band structure to provide public safety agencies with broadband/wideband capability is important. NPSTC urges the Commission, in establishing the parameters of this band segment, to recognize that enormous

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<sup>10</sup> See [www.projectmesa.org](http://www.projectmesa.org)

The Commission's effort to update the current 700 MHz band structure to provide public safety agencies with broadband/wideband capability is important. NPSTC urges the Commission, in establishing the parameters of this band segment, to recognize that enormous work has already been completed with regard to narrowband voice channels and that restructuring this part of the band as proposed by any current proposal is not realistic. The Commission should also adhere to the principle that as public safety is a local and state responsibility, the administration of the broadband/wideband channels should be entrusted to local officials through the Regional Planning Committees. NPSTC commits to doing all it can to make the regional planning process reflect the necessary levels of fairness and expertise.

Respectfully submitted,

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