



Are You Operating in the T-Band? Changes Will Affect You ***Loss of the T-Band Could Cost \$5.9 Billion***

The T-Band frequencies in 470-512 MHz are authorized for use in 11 metro markets by both public safety and industrial/business users. Public safety has built extensive communications networks on the T-Band, which provides frequencies in metro areas where spectrum demand is the greatest. An unexpected provision of the law that created the Nationwide Public Safety Broadband Network (NPSBN) also requires the Federal Communications Commission (FCC) to recover and auction the public safety T-Band spectrum.

Unless the law is changed, the FCC must start to auction the spectrum no later than February 2021 and to relocate public safety from the band within 2 years after the auction concludes. There is a provision for cost reimbursement from the auction proceeds to agencies that have to relocate, but the legislation does not address a new spectrum home or commit to a specific reimbursement amount. The law does not address industrial/business users in the T-Band. The FCC cannot change the requirement, only Congress can amend the law.

Report Finds These Key Conclusions: The National Public Safety Telecommunication Council (NPSTC's) T-Band Working Group has released a comprehensive report, available at www.npstc.org with the following conclusions:

Given the lack of alternative spectrum, cost of relocation, major disruption to vital public safety services and likelihood that the spectrum auction would not even cover relocation costs, NPSTC believes implementing the T-Band legislation is not feasible, provides no public interest benefit, and that the matter should be re-visited by Congress.

Spectrum : Analysis of public safety spectrum bands shows that at least 5 of the 11 metro areas do not have sufficient spectrum in any band to relocate their existing T-Band operations. These areas are the Boston, Chicago, Los Angeles, New York, and Philadelphia metros. The adequacy of relocation spectrum in three additional areas, San Francisco, Washington, D.C., and Pittsburgh is marginal. It is not yet viable to rely on the planned nationwide public safety broadband network as a likely option to support mission critical voice operations that would be displaced from the T-Band.

Cost: The cost to move public safety operations in the 11 metro areas to new frequencies is estimated to cost in excess of \$5.9 billion. If TV and industrial/business were also required to move, that would require additional relocation funding, resulting in the net auction revenue being a greater negative value.

Public Gain It appears the intent of the law may be to gain additional broadband spectrum for public use. Extensive TV broadcast operations throughout the country and industrial/business systems in 11 metro markets will remain on T-Band channels even if public safety systems are relocated out of the band. These circumstances are unlikely to produce the auction revenue needed for public safety relocation or result in additional broadband spectrum for public use.