

March 16, 2023

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

Re: WP Docket No. 07-100

Dear Secretary Dortch:

NPSTC submits this letter of support for the extension of time to file comments as requested jointly by the American Petroleum Institute, American Association of State Highway and Transportation Officials, Enterprise Wireless Alliance, Forestry Conservation Communications Association, International Municipal Signal Association, National Sheriffs' Association and Utilities Technology Council, i.e., (The Joint Parties).

The National Public Safety Telecommunications Council (NPSTC) is a federation of public safety organizations whose mission is to improve public safety communications and interoperability through collaborative leadership. NPSTC pursues the role of resource and advocate for public safety organizations in the United States on matters relating to public safety telecommunications. Accordingly, NPSTC provides guidance on issues that can either negatively impact or benefit the operation of public safety communications.¹

¹ APCO International, the International Association of Chiefs of Police (IACP) and the International Association of Fire Chiefs (IAFC) abstained from voting on this letter of support.

In the Seventh Report and Order in this proceeding, the Commission decided to require the use of a single nationwide Band Manager for the 4.9 GHz band, a completely new approach for this spectrum and the licensees who rely on the band for mission critical communications. However, as pointed out in the Joint Parties' extension request, many aspects of implementation are deferred to the Ninth Further Notice of Proposed Rulemaking.

These include the process to select the Band Manager, as well as numerous policy and rules by which the Band Manager would operate, all yet to be decided. These policies and rules encompass how the Band Manager will minimize interference, provide priority and pre-emption to public safety and lease spectrum to non-public safety entities in a manner that still maintains the band's primary purpose to meet public safety requirements. Furthermore, potential non-public safety lessees include those entities that deploy, maintain and operate our nation's critical infrastructure, key resources of concern in the current environment of cybersecurity and terrorism.

NPSTC believes the Commission would be well-served by providing additional time for these experienced entities to finalize their joint recommendations on this important matter. Furthermore, it is not at all clear why a grant of the Joint Parties' extension request would be detrimental to this proceeding.

Respectfully submitted,



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