



Participating in “The Process” a/k/a Making your Voice Heard at the FCC

A NPSTC Tutorial on Filing Comments, Replies and
Other Documents in FCC Proceedings

*NPSTC is a federation of organizations whose mission is to improve
public safety communications and interoperability through collaborative leadership.*



NPSTC

Gee! I know the FCC is asking interested parties for input, and/or somebody else has said something that I want to endorse or that I feel is totally wrong. I want to put in my \$0.02 worth on those issues. Can I do that?

If so, what's the easiest way to do it?



“Telling the FCC what it Needs to Know”

Providing the FCC with everyone’s thoughts on the critical issues facing public safety is key as the FCC tries in the future to determine how to best serve the “public interest” with public safety communications

All members of the public safety community and those with a vested interest in public safety communications should avail themselves of the opportunity to participate in all relevant FCC Rulemakings

The FCC Electronic Comment Filing System (ECFS) provides a simple and efficient way to let the FCC know what you are thinking by filing Comments, Replies, ExParte Notices and other documents related to FCC Rulemakings



“Telling the FCC what it Needs to Know”

There are two alternative ways to get to the ECFS template necessary to file documents with FCC.

First, one can get to the “filing” template

- By going to the ECFS Home Page <http://www.fcc.gov/cgb/ecfs/> on the FCC site, and then clicking on the “Submit a Filing” link under “ECFS Main Links” at the top of the column on the right hand side of the ECFS Home Page.

OR

Alternatively, one can get to the “filing” template

- By typing the template URL http://fjallfoss.fcc.gov/prod/ecfs/upload_v2.cgi or http://gullfoss2.fcc.gov/prod/ecfs/upload_v2.cgi into your web browser.

Either method shown above will get you to the template in ECFS necessary for filing documents.

The template is illustrated in the next two slides. Instructions and tips for completing the “filing” template follow the illustration.



ECFS “Filing” Template – Part 1



Electronic Comment File Submission

Sending your comment is a 2-step process. The first step is to complete the Cover Sheet below. The second step is to choose one of the two transmittal methods: sending a file, or sending a short message that you type directly on this page.

Cover Sheet

1. Proceeding (e.g. 00-221, RM-9920) (required)		
<input type="text"/>		
2. Mail Correspondence To: (required) <input type="checkbox"/> Name <input type="checkbox"/> Law Firm <input type="checkbox"/> Attorney		
3. Name of Applicant/Petitioner (required)		
<input type="text"/>		
4. Law Firm Name (required if represented by counsel)		
<input type="text"/>		
5. Attorney Name (optional)		
<input type="text"/>		
6. Email-id (optional)		
<input type="text"/>		
7. Mailing Address For Correspondence (required)		
<input type="text"/>		
<input type="text"/>		
8. City (required)	9. State (required)	10. Zip Code (required)
<input type="text"/>	<input type="text"/>	<input type="text"/>
11. Ex-Parte/Late Filed <input type="checkbox"/> (optional)	12. Document Type (required)	
<input type="text"/>	<input type="text"/>	
13. File Number (optional)		
<input type="text"/>		

Clear Cover Sheet

http://gullfoss2.fcc.gov/prod/ecfs/upload_v2.cgi

ECFS “Filing” Template – Part 2

Please complete **ONE** of the following:

Send Comment Files to FCC (Attachments)

File Description: **File:**

Select one of these file types or convert your file to one of these types:

OR

Send a Brief Comment to FCC (typed-in)

If you are entering over 70 characters on one line
be sure to press your carriage return to ensure proper line-
wrapping.



NPSTC Completing Part 1 of ECFS "Filing" Template



Electronic Comment File Submission

Sending your comment is a 2-step process. The first step is to complete the Cover Sheet below. The second step is to choose one of the two transmission methods: sending a file, or sending a short message that you type directly on this page.

Cover Sheet		
1. Proceeding (e.g. 06-229, RM-9920) (required)		
<input type="text"/>		
2. Mail Correspondence To: (required) <input type="checkbox"/> Name <input type="checkbox"/> Law Firm <input type="checkbox"/> Attorney		
3. Name of Applicant/Petitioner (required)		
<input type="text"/>		
4. Law Firm Name (required if represented by counsel)		
<input type="text"/>		
5. Attorney Name (optional)		
<input type="text"/>		
6. Email-id (optional)		
<input type="text"/>		
7. Mailing Address For Correspondence (required)		
<input type="text"/>		
8. City (required)	9. State (required)	10. Zip Code (required)
<input type="text"/>	<input type="text"/>	<input type="text"/>
11. Ex-Parte/Late Filed (optional)	12. Document Type (required)	
<input type="checkbox"/>	<input type="text"/>	
13. File Number (optional)		
<input type="text"/>		

Clear Cover Sheet

This is the most important info you need for the ECFS "Filing" template.

Maybe you know the correct Proceeding number, but if not where do you get the Proceeding number? Some suggestions:

- On the FCC "Public Notice" announcing the Proceeding, or
- In the FCC Daily Digest, where the "Notice" was published, or
- Ask a Public Safety communications colleague, or
- Ask a Radio Manufacturer contact you know, or
- Ask a NPSTC contact you know, or
- Contact the NPSTC support office.

NOTE: FCC proceeding numbers appear in the format similar to WT96-86, WT99-87, WT 02-55, PS 06-229. When entering the Docket number into the search template DO NOT include the two-letter identifier. Simply enter the numbers and the "-" associated with the two letter identifier, e.g. "06-229."



NPSTC Completing Part 1 of ECFS "Filing" Template



Electronic Comment File Submission

Sending your comment is a 2-step process. The first step is to complete the Cover Sheet below. The second step is to choose one of the two transmission methods: sending a file, or sending a short message that you type directly on this page.

Cover Sheet

1. [Proceeding](#) (e.g., 00-221, RM-9920) (required)

2. Mail Correspondence To: (required) Name Law Firm Attorney

3. Name of Applicant/Petitioner (required)

4. Law Firm Name (required if represented by counsel)

5. Attorney Name (optional)

6. Email-id (optional)

7. Mailing Address For Correspondence (required)

8. City (required) 9. State (required) 10. Zip Code (required)

11. Ex-Parte/Late Filed (optional) 12. Document Type (required)

13. File Number (optional)

Clear Cover Sheet


You can also obtain the Proceeding number by clicking on the [Proceeding](#) link on the ECFS "Filing" template. Clicking on the [Proceeding](#) link will take you to an additional search tool that may be helpful in identifying the appropriate Proceeding number for the ECFS "Filing" template.

The Proceeding number search tool is illustrated on the next slide.

NOTE: At times there may be multiple proceeding numbers assigned to a given proceeding. For example PS 06-229 is also identified as WT 06-150. In the Proceeding Block you only enter one identifier. If you want to file under each proceeding number you must complete a separate filing for each proceeding number.



Proceeding Number "Search" Template

 **Federal Communications Commission**

Directions: Enter the proceeding you are searching for then click *Search For Proceedings*.
Ex: To view all proceedings with a '96' in them -- enter 96 then push *Search For Proceedings*.
To view all of the proceedings in ECFS -- enter an asterisk (*) then push *Search For Proceedings*.

[Return to ECFS Home Page](#)

FCC Home Page	Search	Commissioners	Bureaus/Offices	Finding Info
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http://gullfoss2.fcc.gov/prod/ecfs/comsrch_v2.cgi?ws_mode=proc_name

Follow the "Directions:" to search for proceeding numbers.

NOTE: to successfully search you should have some prior knowledge, for example, the year the particular proceeding was started by the FCC so you can enter the last two digits of the year to initiate a search. Entering an asterisk (*) and starting a search will provide a listing several thousand items in length.

Even entering the last two digits of the CORRECT year will result in a listing several hundred items in length, that must then be manually searched to identify the correct Proceeding number.

If you do not know the Proceeding number, asking somebody what number is correct will probably be less cumbersome than using the Proceeding number search tool.

A small part of the Proceeding Number search results when "06" entered into the tool

- [WC 06-232](#) [Enter More Search Criteria](#)
Application filed for the transfer of control of Arrival Communications, Inc., and U.S. Telepacific Corp.
- [WT 06-231](#) [Enter More Search Criteria](#)
Comments on Ronan Telephone Company request for Three additional years to meet Tribal lands bidding credit construction requirement.
- [WC 06-230](#) [Enter More Search Criteria](#)
Application for the transfer of control of Curtis Telephone Company and Total Communications Inc. to Consolidated Companies, Inc..
- [IB 06-23](#) [Enter More Search Criteria](#)
New Skies satellites Holdings Ltd. and SES Global S.A. seek consent to transfer control of authorizations held by New Skies Networks, Inc.
- [PS 06-229](#) [Enter More Search Criteria](#)
In the Matter of Implementing a nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band. Development of Operational, Technical and Spectrum Requirements for Meeting Federal, State and Local Public Safety Communication .
- [WC 06-228](#) [Enter More Search Criteria](#)
Application filed for the transfer of control of Lightyear Network Solutions, LLC, First Communications, LLC, and Xtension Services, Inc. to First Communications, Inc. .
- [WC 06-227](#) [Enter More Search Criteria](#)
Application filed for the transfer of control of Norlight Telecommunications, Inc. from Journal Communications, Inc. to Q-Comm Corporation. .



NPSTC Completing Part 1 of ECFS “Filing” Template



Electronic Comment File Submission

Sending your comment is a 2-step process. The first step is to complete the Cover Sheet below. The second step is to choose one of the two transmittal methods: sending a file, or sending a short message that you type directly on this page.

Cover Sheet

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<input type="text"/>		
<input type="text"/>		
8. City (required)	9. State (required)	10. Zip Code (required)
<input type="text"/>	<input type="text"/>	<input type="text"/>
11. Ex-Parte/Late Filed (optional)	12. Document Type (required)	
<input type="checkbox"/>	<input type="text"/>	
13. File Number (optional)		
<input type="text"/>		

Clear Cover Sheet

Once you have entered the appropriate proceeding number into the ECFS “Filing” template, you fill in the appropriate identifying information in Items 2 through 10.

- Item 2 – identify where future correspondence should be sent.
- Item 3 – Insert the name of the agency or the individual on whose behalf the comments are being filed.
- Items 4 & 5 – You are not required to use an attorney/law firm to file comments, but if one is used you may show the law firm name in Item 4 and the specific attorney in item 5.
- Items 7 through 10 – Insert the correct P.O. address information for the Name, Law Firm or Attorney indicated in Item 2. Note: Only a five digit Zip Code is required.



Completing Part 1 of ECFS “Filing” Template



Electronic Comment File Submission

Sending your comment is a 2-step process. The first step is to complete the Cover Sheet below. The second step is to choose one of the two transmittal methods: sending a file, or sending a short message that you type directly on this page.

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13. File Number (optional)		
<input type="text"/>		

Clear Cover Sheet

- No entries in Items 11 and 13 are required.
- Clicking on this menu button in Item 12 will provide a listing of the types of documents you will be filing in the ECFS system. The types of documents you will most commonly be filing are:

- Comment
- Letter
- Notice of Ex Parte
- Reply to Comments

Click on the specific document type in the list provided when the menu button is hit and the type of document will be automatically entered in Item 12. The type of document being filed will also be automatically entered into the “File Description:” box of the “*Send Comment Files to FCC (Attachments)*” section of Part 2 of the ECFS “Filing” template.

After the appropriate information is entered into Items 1 through 13, scroll down on the ECFS “Filing” template to get to Part 2 of the template.

Completing ECFS “Filing” Template – Part 2

Please complete **ONE** of the following:

Send Comment Files to FCC (Attachments)

File Description: File:

Select one of these file types or convert your file to one of these types:

OR

Send a Brief Comment to FCC (typed-in)

If you are entering over 70 characters on one line be sure to press your carriage return to ensure proper line-wrapping.

After the appropriate information is entered if a separate document is being filed, click on the button to commence the “Filing” process

If you have prepared a separate document containing your comments, etc. the first section of Part 2 is the one that should be completed to file the document

- This item will be automatically completed when you select the type of document in Item 12 of Part 1.
- Click the **Browse** button and a separate “Choose File” window will open. Navigate in the “Choose File” window to the exact location of the document you want to file through ECFS. Click on the file name in the “Choose File” window of the document file you wish to file and then click on the **Open** button in the lower right hand corner of the “Choose File” window. The exact address of the document to be filed will be entered into the “File:” box.
- Click on this menu button to get a list of file formats. Select the file format that is consistent with the document you are filing in ECFS. It is recommended you convert the document to pdf format before filing, but if you are unable the FCC will convert the document to pdf format before posting it in ECFS.



NPSTC *Separate Document Requirements*

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of

The Development of Operational, Technical and Spectrum Requirements For Meeting Federal, State and Local Public Safety Agency Communication Requirements Through the Year 2010)
WT Docket No.)

Comments of M/A-COM Private Radio Systems, Inc. to the Sixth Notice Rulemaking.

To the Commission:

INTRODUCTION

M/A-COM Private Radio Systems, Inc. (M/A-COM) applauds the Commission's efforts to assure the Commission rules keep pace with and recognize the diversity that is becoming available and will become available in the future as public safety full-scale into 700 MHz digital communications. Adopting Adjacent Channel C (ACCP) or Adjacent Channel Power (ACP) emission limits for public safety transmission in the 764-776 and 794-806 MHz frequency bands is far preferable to emission "masks" for the various types of communications that public safety will 700 MHz frequency bands.

M/A-COM is pleased to say that it generally supports all of the proposals in the Sixth Notice of Proposed Rulemaking concerning establishing

While the FCC has not designated a particular format to use when submitting documents through ECFS, there are some minimum document requirements that should be followed. **(See 47 C.F.R §1.49 {Section 1.49 of the FCC Rules})**

§1.49 Specifications as to pleadings and documents.

(a) All pleadings and documents filed in paper form in any Commission proceeding shall be typewritten or prepared by mechanical processing methods, and shall be filed on A4 (21 cm. x 29.7 cm.) or on 8.5 x 11 inch (21.6 cm. x 27.9 cm.) paper with the margins set so that the printed material does not exceed 6.5 x 9.5 inches (16.5 cm. x 24.1 cm.). The printed material may be in any typeface of at least 12-point (0.42333 cm. or 12/72") in height. The body of the text must be double spaced with a minimum distance of 7/32 of an inch (0.5556 cm.) between each line of text. Footnotes and long, indented quotations may be single spaced, but must be in type that is 12-point or larger in height, with at least 1/16 of an inch (0.158 cm.) between each line of text. Counsel are cautioned against employing extended single spaced passages or excessive footnotes to evade prescribed pleading lengths. If single-spaced passages or footnotes are used in this manner the pleading will, at the discretion of the Commission, either be rejected as unacceptable for filing or dismissed with leave to be refiled in proper form. Pleadings may be printed on both sides of the paper. Pleadings that use only one side of the paper shall be stapled, or otherwise bound, in the upper left-hand corner; those using both sides of the paper shall be stapled twice, or otherwise bound, along the left-hand margin so that it opens like a book. The foregoing shall not apply to printed briefs specifically requested by the Commission, official publications, charted or maps, original documents (or admissible copies thereof) offered as exhibits, specially prepared exhibits, or if otherwise specifically provided. All copies shall be clearly legible.

(b) Except as provided in paragraph (d) of this section, all pleadings and documents filed with the Commission, the length of which as computed under this chapter exceeds ten pages, shall include, as part of the pleading or document, a table of contents with page references.

(c) Except as provided in paragraph (d) of this section, all pleadings and documents filed with the Commission, the length of which filings as computed under this chapter exceeds ten pages, shall include, as part of the pleading or document, a summary of the filing, suitably paragraphed, which should be a succinct, but accurate and clear condensation of the substance of the filing. It should not be a mere repetition of the headings under which the filing is arranged. For pleadings and documents exceeding ten but not twenty-five pages in length, the summary should seldom exceed one and never two pages; for pleadings and documents exceeding twenty-five pages in length, the summary should seldom exceed two and never five pages.

(d) The requirements of paragraphs (b) and (c) of this section shall not apply to:

- (1) interrogatories or answers to interrogatories, and depositions;
- (2) FCC forms or applications;
- (3) transcripts;
- (4) contracts and reports
- (5) letters; or
- (6) hearing exhibits, and exhibits or appendices accompanying any document or pleading submitted to the Commission.

(e) Petitions, pleadings, and other documents associated with licensing matters in the Wireless Radio Services may be filed electronically in ULS. See §22.6 for specifications.

(f)

(1) In the following types of proceedings, all pleadings, including permissible ex parte submissions, notices of ex parte presentations, comments, reply comments, and petitions for reconsideration and replies thereto, may be filed in electronic format:

- (i) General rulemaking proceedings other than broadcast allotment proceedings;
- (ii) Notice of inquiry proceedings; and
- (iii) Petition for rulemaking proceedings (except broadcast allotment proceedings).

(2) For purposes of paragraphs (b) and (c) of this section, and any prescribed pleading lengths, the length of any document filed in electronic form shall be equal to the length of the document if printed out and formatted according to the specifications of paragraph (a) of this section, or shall be no more than 250 words per page.

NOTE: The table of contents and the summary pages shall not be included in complying with any page limitation requirements as set forth by Commission rule.



Completing ECFS “Filing” Template – Part 2

Please complete **ONE** of the following:

Send Comment Files to FCC (Attachments)

File Description: File:

Select one of these file types or convert your file to one of these types:

OR

Send a Brief Comment to FCC (typed-in)

If you are entering over 70 characters on one line be sure to press your carriage return to ensure proper line wrapping.

If you have not completed a separate document to file you can complete the “**Send a Brief Comment to FCC (typed-in)**” section of Part 2.

Simply type in whatever comments you wish to make in this area. Please note, there is a requirement to use carriage return after every 70 characters are entered in order to have appropriate line wrapping.

After the appropriate comment(s) have been entered, if you are not filing a separate document, click on the button to commence the “Filing” process



ECFS Filing Acknowledgement



The FCC Acknowledges Receipt of Comments From ...
Anywhere Public Safety Agency
...and Thank You for Your Comments

Your Confirmation Number is: '2007523140587 '
Date Received: May 23 2007
Docket: 06-229
Number of Files Transmitted: 1

DISCLOSURE

This confirmation verifies that ECFS has received and accepted your filing. However, your filing will be rejected by ECFS if it contains macros, passwords, redlining, read-only formatting, a virus or automated links to source documents that is not included with your filing. Filers are encouraged to retrieve and view their filing within 24 hours of receipt of this confirmation. For any problems contact the Help Desk at 202-418-0193.

[Initiate a Submission](#) | [Search ECFS](#) | [Return to ECFS Home Page](#)

If you have correctly completed the "Filing" template, attached a document or typed in a brief comment, and submitted the document or comment, you will receive an acknowledgement similar to the one shown here.

Please note the FCC recommends you verify your document or comment has been properly posted under the appropriate proceeding number(s) within 24 hours of getting the acknowledgement receipt.

(Consult the NPSTC Tutorial on searching ECFS Documents filed with the FCC for instructions on how to find the document or comment you have filed.)



RECAP

Gosh, that sounds confusing and you need to know a lot to use this ECFS “Filing” tool?

Not True!!



RECAP

The ECFS “Filing” tool is easily located and easy to use.

The only thing you actually need to know beforehand is the FCC Proceeding Number and that shouldn’t be hard to determine.

Participate in the FCC Rulemaking Process!

**Be Part of the Solution
rather than
Part of the Problem**