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Public Safety
Communications**

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November 18, 2005

Mr. Michael J. Wilhelm
Chief, Public Safety and Critical Infrastructure Division
Wireless Telecommunications Commission
Federal Communications Commission
Washington, D.C. 20554

Re: *Ex Parte* Communication
WT Docket No. 05-157
WT Docket No. 96-86

Dear Mr. Wilhelm:

During the past week, the National Public Safety Telecommunications Council (NPSTC) held Governing Board and Committee meetings. At the meetings the need for additional spectrum, particularly for broadband applications, was addressed. The discussions included examining the current 700 MHz channel plan allocated to public safety communications.

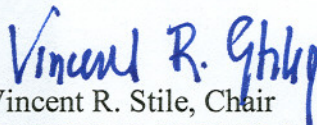
NPSTC believes it important that additional spectrum be allocated for public safety services, particularly for meeting expanding mobile broadband demands below 1 GHz. The current 700 MHz allocation, no matter what its structure, is not adequate to meet these requirements. Moreover, as we have noted previously, the Commission's allocation of channels within 700 MHz for narrowband voice communications is critical and should not be altered. Public safety agencies and manufacturers have already devoted significant time and expense to plan for the use of these channels, major systems have been procured and are under construction, and no consideration should be given to any changes within these channels.

In the context of the 700 MHz band wideband and reserved channels, NPSTC recommends that the Commission review, through a further notice of proposed rulemaking, how these frequencies could be used to promote broadband access. Examining whether the wideband channels could be used more efficiently to address some of the broadband needs of public safety that cannot be satisfied at 4.9 GHz is timely. Our discussions this week reflect varied and robust views, which we think indicates a need for the Commission to enhance its record.

Any further notice should explore the potential for allowing current 700 MHz wide band channels to be aggregated into channels larger than 150 kHz to facilitate broadband. Interests that submit a proposed realignment should detail a specific channel plan, the interference environment that would accompany it and the degree it would respond to the demand for broadband applications. The objective of interoperability should also be evaluated. A revised band plan should address how interoperability is best promoted, whether and what standard should be adopted and the question of whether all radios should be required to support this standard. As these issues are intertwined with the structure of the band, the Commission should defer action on the pending issue of whether to adopt a wideband interoperability standard in 700 MHz until the review is complete.

NPSTC commends the Commission's efforts to promote public safety communications and looks forward to assisting it in examining the issues.

Respectfully,



Vincent R. Stile, Chair
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