



## **National Public Safety Telecommunications Council**

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Press Release

July 1, 2010

### **NPSTC Files Comments Clarifying Video Throughput Requirements; Urges FCC To Rely on Real World Experience in D Block Decisions**

The National Public Safety Telecommunications Council (NPSTC) submitted ex parte comments to the Federal Communications Commission (FCC) to clarify erroneous assumptions on video throughput requirements for public safety. The Commission's white paper on capacity, *The Public Safety Nationwide Interoperable Broadband Network: A New Model for Capacity, Performance and Cost*, aimed at justifying the Commission's recommendation not to reallocate the D block spectrum to public safety claims that 10 MHz of broadband spectrum in the 700 MHz provides "more than the required capacity for day to day communications..."

In the white paper, the Commission cites data rates for video of 256 kb/s, quoting a NPSTC report issued three years ago, the *Public Safety 700 MHz Broadband Statement of Requirements (SoR)*. The video throughput numbers in the SoR were a minimum requirement designed to help attract a commercial D Block bidder. Unfortunately, as the failed D Block auction showed, even the minimum specifications as recommended by NPSTC were not attractive to a commercial operator that would need to compete with other operators that did not have to meet public safety requirements. It was never NPSTC's intent to imply that 256 kb/s would be a sufficient data rate to support the video levels of quality needed by public safety in all situations. Additionally, the projected use of video and data by public safety is much greater today than it was three years ago.

NPSTC's comments also recommend that the Commission should rely more on input from public safety users who have had experience with public safety incidents and understand the needed capacity. On February 23, the City of New York submitted a white paper addressing why the D Block should be reallocated to public safety, including examples from real world experiences, not just academic theories.

NPSTC believes that establishing capacity requirements for a nationwide broadband network that will take several years to deploy and must serve public safety for many years should not be set based on minimum requirements. Doing so provides no room to grow and undercuts public safety's goals for broadband communications from the outset.

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

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