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Communications**

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Communications Officials -
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Association

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International Association of
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Wildlife Agencies

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LIAISON ORGANIZATIONS

Federal Communications Commission

Federal Partnership for Interoperable
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Information Administration

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Association

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February 6, 2006

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 05-157
WT Docket No. 96-86

Dear Mr. Wilhelm:

Under consideration by the Commission is whether the public safety 700 MHz channel structure should be altered to promote broadband applications. The National Public Safety Telecommunications Council (NPSTC) has continued to examine how best to pursue this goal. NPSTC submits this letter for the Commission's consideration and to assist in presenting issues for comment in any proceeding reexamining the 700 MHz band structure.

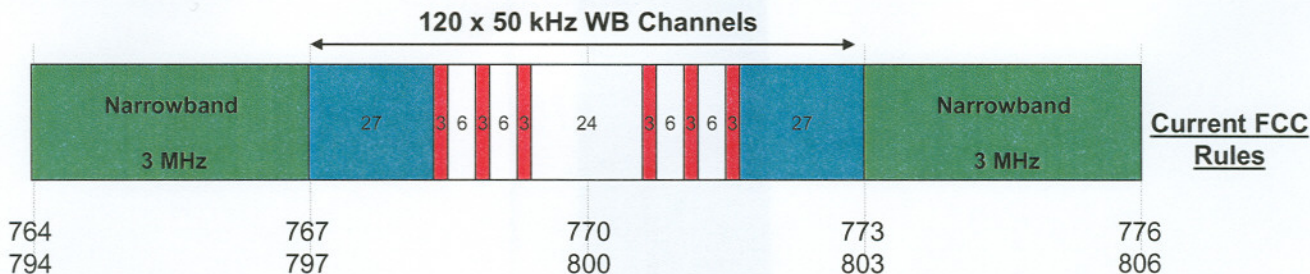
NPSTC has noted previously that public safety's need for broadband capability and other requirements will not be resolved by the 700 MHz band alone. The 700 MHz allocation is an important and valued commitment, yet no matter what its structure, it is not adequate to meet current or future demands. The challenge any restructuring faces is recognizing that the voice and interoperability requirements, and the guard band channels protecting these operations under the current 700 MHz structure, are critical. That significant investment has already been committed to planning how these narrowband voice channels will be used and that agencies have procured equipment to use these channels which manufacturers have commenced fulfilling reflects the importance to maintain the number of narrowband channels and their location. NPSTC's review has been conducted within this context.

The recent analysis and deliberations by NPSTC members and participating interests indicates areas of agreement. The first area addresses the need for the 700 MHz regional planning committees (RPCs) to be responsible for determining how a region's broadband or wideband deployments will operate within the parameters the Commission determines in the regions where they are active and have the technical competency to do the technical work. We think this is necessary because agency requirements differ across the country and change at varying times. Local officials who participate in the regional planning process are in the most effective position to determine how to meet the region's needs. Additionally, the amount of spectrum required to support broadband applications entails coordinating many agencies; the RPCs fulfill these functions well in the regions they are organized and active.

As noted, the need to maintain the number and location of the 700 MHz narrowband voice channels and the guard bands established to protect them is where NPSTC's analysis commenced. We also premised any revised structure on the Commission's policy, which we agree with, of allowing licensees to aggregate wideband channels from 50 kHz building blocks. Additionally, our analysis determined it important to maintain a .975 MHz guard band channel between broadband and other operations.

With this background, our analysis indicates the ability to structure up to three 1.25 MHz channels for broadband or wideband purposes. These channels would consist of the 50 kHz baseline channelization and be located across 767-773/797-803 MHz. Within 767-773/797-803 MHz, agencies would have the flexibility to deploy wideband and/or broadband applications. Several alternatives are possible, including dedicating the entire 3.75 MHz to wideband operations or providing incremental 1.25 MHz bandwidth for broadband operations. All three 1.25 MHz channels could be aggregated by an RPC to provide the entire 3.75 MHz bandwidth, centered at 770.0/800.0 MHz, for broadband purposes. Superimposed on the current 700 MHz band plan, this proposal would align as follows:

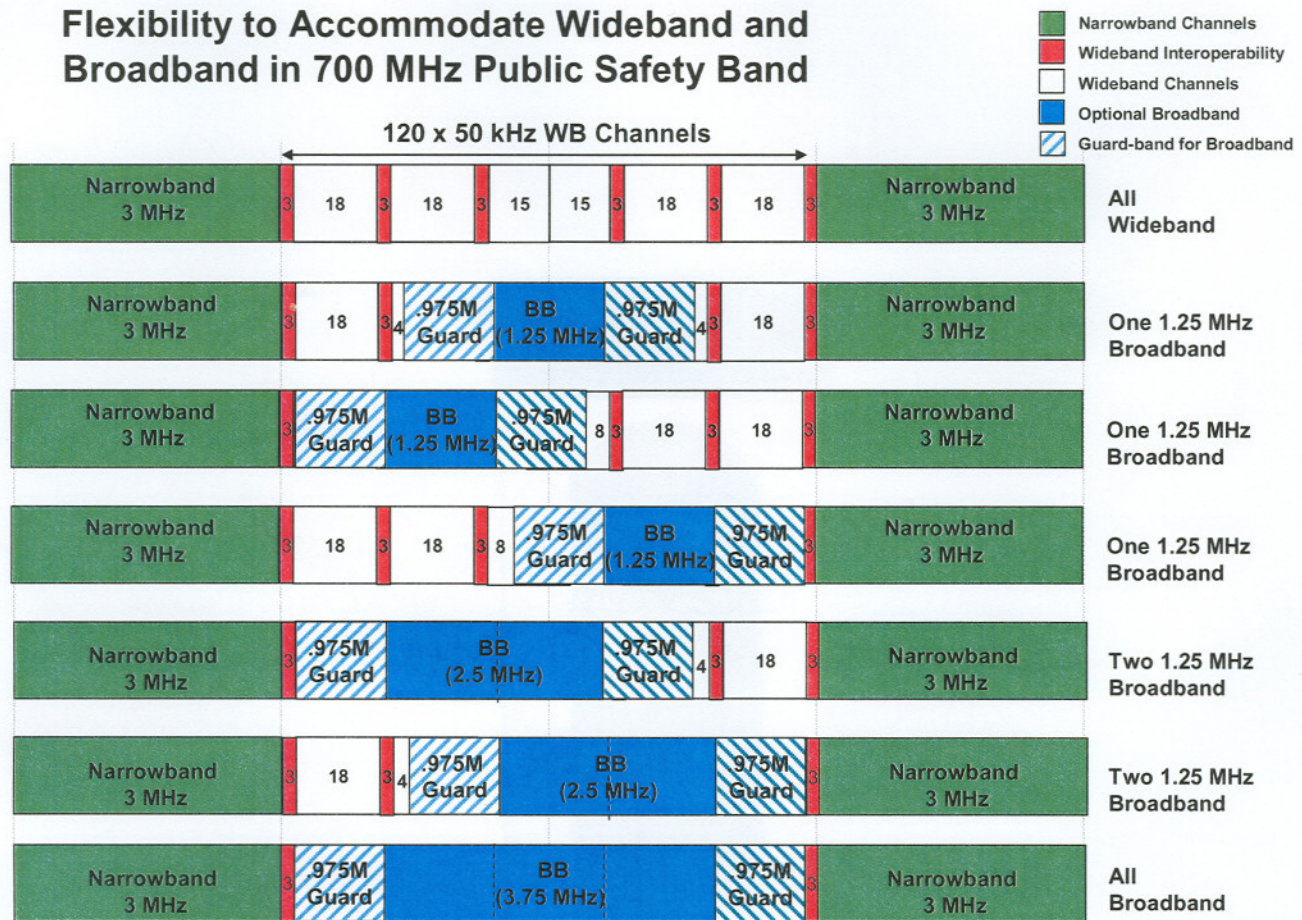
Public Safety 700 Bandplan



Points of Agreement to date as approved by NPSTC Board 1/25/06:

- Narrowband spectrum must be fully protected with no change in location of narrowband blocks
- Provide a 50 kHz baseline channelization across 767-773/797-803
- Within 767-773/797-803 provide flexibility to deploy wideband and/or broadband per agency requirements and RPC approval
- When broadband is deployed, it is located within a 3.75 MHz block centered at 770.0/800.0 MHz
- Broadband use within the 3.75 MHz block would be channelized to accommodate up to three 1.25 MHz channels
- These 1.25 MHz channels can be aggregated to provide broadband channels up to 3.75 MHz wide

Flexibility to Accommodate Wideband and Broadband in 700 MHz Public Safety Band



Note: Location of WB interop channels illustrative- actual recommendation TBD

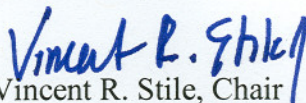
The consensus from which this proposal emerged flows from several factors. NPSTC continues to be strongly opposed to any change of the current Narrowband voice configuration. Voice communications at 700 MHz will afford public safety agencies tangible enhancements that will improve response and overall operations. We believe that the proposal will protect the narrowband and interoperability channels from interference and afford opportunity for broadband and wideband applications.

Moreover, we think the proposal provides agencies a flexible means to obtain broadband or wideband capability in the varying environments throughout the nation. Significantly, our analysis is based on the understanding that technologies exist in the market to provide broadband and wideband applications within the parameters of the proposal.

NPSTC will continue to examine the issues surrounding the possible restructuring of the 700 MHz public safety band. Included in this review is how the band meets the challenge of interoperability, particularly with regard to wideband and broadband and the location of these channels. These issues are intertwined with the overall structure of the plan

NPSTC commends the Commission's efforts to promote and improve public safety communications. We look forward to the Commission's work in this area and the participation of the many interested parties seeking to contribute to effective public safety communications.

Respectfully,



Vincent R. Stile, Chair
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