

To: National Public Safety Telecommunications Council  
Common Nomenclature Working Group

January 15, 2007

From: Texas Statewide Interoperability Executive Committee  
Robert, Pletcher, Chairman

Within the State of Texas and throughout the United States, the public safety radio channels that are used by the public safety agencies are referred to by names that meet the operational requirements of each agency. These channel names are as varied as the jurisdictions that use them. Historically, the interoperability channels that have been used are extremely diverse and carry a variety of nomenclatures. In 2001, the National Coordination Committee (NCC), which was formed by the Federal Communications Commission (FCC), proposed national interop channel naming guidelines to provide for standardization throughout the United States. These guidelines were based on the situation at that time, which included local, tribal, regional, state and federal users.

First responders are faced with situations where the interoperability channels that they need for communications may be available in their radios but carry different names. The Texas Interoperability Channel Plan (TICP) identifies interoperability channels for use during emergency responses. The interop channel names that are set out in the TICP are not compliant with those identified in the NCC plan.

The NCC naming plan has met stiff opposition here in Texas. The main resistance to the NCC proposed naming scheme within Texas is due to:

- Virtually all radios in Texas are affected – VHF, UHF, 700 & 800 MHz.
- Existing radio users do not support the NCC names because they are not perceived as intuitive nor are they easily spoken and/or understood.
- Although a complete re-programming of 800 MHz radios within Texas will occur over the next several months because of the Sprint-Nextel activities, the NCC 800 MHz channel names were set up to provide consistency in all bands, not to provide an easily understood label for end users.
- No funding has been identified to accomplish the required reprogramming, which would cause any change to the current channel names to be perceived as an unfunded mandate.
- Although many legacy radios have been replaced in Texas, a significant number of older radios in Texas (10,000+) cannot support the channel names.
  - To replace these 10,000+ radios would cost an estimated \$18-22 million.
- Virtually all of the public safety radios within the state will need to be reprogrammed.
  - Rough Order of Magnitude costs for reprogramming (800 MHz excluded) would be \$7 million
    - Technical labor for reprogramming is estimated at 40,000 hours.
    - Down time for public safety officers and vehicles due to reprogramming could exceed 50,000 hours.

- 800 MHz costs are not estimated because reprogramming these radios could be covered by Sprint-Nextel as part of their initiative.
- The NCC plan uses a number prefix to identify the portion of radio spectrum where each channel is located.
  - Use of a number to identify the channel band is not intuitive and should be changed to a letter (LB, V, U) for those channels below 512 MHz.
  - Use of a number (7, 8) for 700 & 800 MHz is intuitive and should be used.
- The NCC plan was developed to provide a migration path for older radios with a two-digit channel number display, e.g. many of the legacy radios at the federal level.
  - Since 2001, most of this type of equipment has been replaced or is currently scheduled for replacement.
  - Currently available radios are capable of 8 or more characters
  - The reasoning for this aspect of the NCC naming scheme is no longer valid.
- The NCC plan does not address the fact that both industry and technology are rapidly moving from analog to digital equipment.
  - Currently, the Texas requires that all interoperability communications operate in the analog, unencrypted mode but establishes a digital naming scheme for future technology enhancements.
  - As P-25 Phase 2 equipment becomes available, only the digital Common Air Interface mode will be supported, which will orphan the analog equipment that is in use nationally.
  - In order to differentiate between analog and digital modes of operation, an additional letter “D” to designate “digital” could be appended to the NCC names but this could cause more confusion than clarity.
- The NCC plan uses the letter “D” to identify the simplex “talk-around” or “direct” operational mode for those channels that are paired for repeater operation.
  - This convention applies to communication that takes place directly between mobiles and/or portables without the use of repeaters.
  - The NCC plan does not address digital vs. analog modes of operation.
    - Use of the letter “D” should be used only to designate direct or talk-around communications
    - An additional letter “A” should be appended to the channel names to indicate the “analog: mode of operation
    - “Digital” operations should not require any additional identification.
    - This will allow for the identification of mixed mode operations that will occur in the future.
- Changing the existing channel names within Texas will create a situation that could easily take several years to implement, thus creating a situation where many users will have different names for the same channel; creating un-necessary confusion, uncertainty and additional training requirements.
  - We strongly urge NPSTC to produce a plan in a timely manner to alleviate confusion and uncertainty.

The proposed Texas SIEC plan will require changes throughout our state as well as within the public safety community on a national basis. It is proposed as an alternative to the NCC plan in hopes that a consensus plan can be established that all public safety users can support.

Respectfully submitted,

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Texas Statewide Interoperability Executive Committee  
Texas Department of Public Safety