

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
)	
Amendment of Sections 90.20(d)(34) and)	PR Docket No. 13-229
90.265 of the Commission's Rules to Facilitate)	RM-11635
the Use of Vehicular Repeater Units)	
)	

**COMMENTS OF
THE NATIONAL PUBLIC SAFETY TELECOMMUNICATIONS COUNCIL**

The National Public Safety Telecommunications Council (NPSTC) submits these Comments in response to the Commission's Notice of Proposed Rulemaking in the above-captioned proceeding.¹ In these comments, NPSTC supports the Commission's proposal to make additional VHF channels available for vehicular repeater use. NPSTC supports the use of frequency coordination and also recommends that engineering analysis and/or sample frequency coordination be conducted to ensure vehicular repeater use and telemetry operations in the band can co-exist compatibly without interference prior to finalizing any decision. NPSTC also believes a portion of the 700 MHz public safety guardband at 768-769/798-899 MHz should also be considered for public safety narrowband vehicular repeater use.

¹ Amendment of Sections 90.20(d)(34) and 90.265 of the Commission's Rules to Facilitate the Use of Vehicular Repeater

The National Public Safety Telecommunications Council

The National Public Safety Telecommunications Council is a federation of public safety organizations whose mission is to improve public safety communications and interoperability through collaborative leadership. NPSTC pursues the role of resource and advocate for public safety organizations in the United States on matters relating to public safety telecommunications. NPSTC has promoted implementation of the Public Safety Wireless Advisory Committee (PSWAC) and the 700 MHz Public Safety National Coordination Committee (NCC) recommendations. NPSTC explores technologies and public policy involving public safety telecommunications, analyzes the ramifications of particular issues and submits comments to governmental bodies with the objective of furthering public safety telecommunications worldwide. NPSTC serves as a standing forum for the exchange of ideas and information for effective public safety telecommunications.

The following 15 organizations participate in NPSTC:

- American Association of State Highway and Transportation Officials
- American Radio Relay League
- Association of Fish and Wildlife Agencies
- Association of Public-Safety Communications Officials-International
- Forestry Conservation Communications Association
- International Association of Chiefs of Police
- International Association of Emergency Managers
- International Association of Fire Chiefs
- International Municipal Signal Association
- National Association of State Chief Information Officers
- National Association of State Emergency Medical Services Officials
- National Association of State Foresters
- National Association of State Technology Directors
- National Emergency Number Association
- National Sheriffs' Association

Several federal agencies are liaison members of NPSTC. These include the Department of Homeland Security (the Federal Emergency Management Agency, the Office of Emergency Communications, the Office for Interoperability and Compatibility, and the SAFECOM Program;

Department of Commerce (National Telecommunications and Information Administration); Department of the Interior; and the Department of Justice (National Institute of Justice, CommTech Program). In addition, Public Safety Europe is also a liaison member. NPSTC has relationships with associate members, the Telecommunications Industry Association, the Canadian Interoperability Technology Interest Group, the National Council of Statewide Interoperability Coordinators and the Utilities Telecom Council and the Alliance for Telecommunications Industry Solutions.

NPSTC Comments

In its Notice of Proposed Rulemaking (NPRM) in this proceeding, the Commission proposes to amend the rules to permit public safety vehicular repeaters to operate on six remote control and telemetry channels in the 173 MHz area, subject to coordination. The six channels: 173.225, 173.250, 173.275, 173.300, 173.325, 173.350 and 173.375 MHz, are interstitial channels which are interleaved between channels in the Industrial/Business (I/B) frequency pool. While previously restricted to a 6 kHz bandwidth limit, the Commission points out that these interstitial channels are now allowed a bandwidth up to 11.25 kHz, the maximum bandwidth normally associated with a 12.5 kHz channel. However, these six channels are currently limited to non-voice operations, so the rules would need to be changed to allow vehicular repeater voice use.

As noted by the Commission in the Order and NPRM, "...mobile repeaters can improve the safety of first responders by enabling them to stay in radio contact with their command centers in difficult coverage environments where they might otherwise be cut off from communicating."² NPSTC also supports the use of mobile repeaters or vehicular repeaters as they are often called by the user community. Vehicular repeaters are a useful tool to supplement coverage, especially when it is impractical to provide full base station coverage for portable radios in an area.

² Order and NPRM at paragraph 16

NPSTC supports making more efficient use of spectrum as long as doing so does not create interference that cannot be minimized up front by competent frequency coordination. NPSTC believes frequency coordination is essential to opening these six interstitial channels within the Industrial/Business spectrum to public safety vehicular repeater use. Accordingly, NPSTC recommends that engineering analysis and/or sample frequency coordination be done for various scenarios before making any final decision in the rulemaking process. Proposed vehicular repeater operations and telemetry operations are both necessary communications tools and therefore will need to co-exist compatibly without interference to each other. NPSTC recommends that the Commission base any analysis on a 5 watt vehicular repeater power level. The 5 watt power level was previously recommended by the Commonwealth of Virginia for vehicular repeater use on the six proposed VHF frequencies, as noted in the NPRM.³

In the NPRM, the Commission also asks for comments on whether there are other spectrum bands or frequencies that could be used for public safety mobile repeater operations. As noted in comments in other proceedings, NPSTC believes a portion of the 700 MHz public safety guardband spectrum at 768-769/798-799 MHz should be considered for narrowband vehicular repeater operation. Preliminary analysis shows narrowband vehicular repeater use in a portion of the guardband is possible without causing interference to narrowband or broadband public safety operations in the adjacent spectrum above and below the guardband, respectively. Therefore, NPSTC continues to urge FCC and FirstNet, licensee of the 700 MHz guardband, to consider such an approach.

Conclusion

In summary, NPSTC supports the Commission's proposal to open six VHF interstitial

³ Order and NPRM at paragraph 29

channels in the Industrial/Business band for vehicular repeater use, contingent upon a viable frequency coordination process to minimize any interference between vehicular repeater and telemetry uses. NPSTC also believes a portion of the 1+1 MHz guardband at 700 MHz should be considered for public safety vehicular repeater use.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ralph A. Haller". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Ralph A. Haller, Chairman

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