June 2, 2017

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

2019 World Radiocommunication Conference Advisory Committee
Attn: Donna Christianson, WAC Secretariat

Re: IB Docket No. 16-185
Resolution No. 766 Proposal to Elevate Satellite Downlinks to Primary Status in the 460-470 MHz Band, Agenda Item 1.3

The National Public Safety Telecommunications Council (NPSTC) 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. Accordingly, NPSTC provides guidance on issues that can either negatively impact or benefit the operation of public safety communications.

NPSTC supports the recommendations of the Land Mobile Communications Council regarding the Resolution No. 766 proposal to elevate satellite downlinks to primary status in the 460-470 MHz band.¹ The Resolution No. 766 proposal, adopted in the previous World Radiocommunication Conference in 2015 (WRC-2015), is potentially on the table to be considered further in the World Radiocommunication Conference scheduled for 2019 (WRC-19). In the U.S., the WRC-19 Advisory Committee has been charged with addressing various issues for the upcoming 2019 conference. LMCC recommended to the WRC-19 Advisory Committee that if

satellite use is allowed on a primary basis in the band without adequate interference protections, vital terrestrial operations could be adversely affected, threatening both public safety and the economy.

LMCC points out, that a “search of the FCC’s ULS database reveals that there are at least 126,861 active licenses with at least one frequency authorized in the 460-470 MHz band.” LMCC goes on to name just a few examples of these licensees, which include local and state public safety organizations, utilities, water and sewer departments, airlines, hospitals, and pipelines. It is important to note that the statistics cited by LMCC are licenses, and each license can represent tens, hundreds or even thousands of individual users that would be subject to potential interference if adequate protections are not put in place up-front and enforced in actual operation.

Satellite operation is regional or international in nature. If adequate provisions are not put in place to protect terrestrial public safety and critical industrial/business users, the Commission would face the task of using its limited resources to resolve any interference to U.S. terrestrial users, regardless of the “home country” from which the satellite is operated. Therefore, NPSTC believes it is of utmost importance that the WRC-19 Advisory Committee and the Commission ensure that adequate protections be put in place up-front if Resolution 766 moves forward.

The LMCC recommended a comprehensive set of steps to help minimize the chance of interference to terrestrial operations. These steps include involvement of Part 90 private land mobile radio (PLMR) users in formulating any rule changes for the band, inclusion of a LMCC representative and interested members of the PLMR industry in any testing, testing results that show terrestrial operations will be protected from interference, prohibition of continuous carrier mode without monitoring for satellites, no satellite operation over the Part 90 low power pool channels designated in Section 90.267, and the mandatory use of reduced power density, spread spectrum technology and other mitigation measures discussed in Resolution 766. In addition, LMCC recommended provisions to reduce power or shut down satellite operation remotely when a satellite is passing over the U.S. if needed to resolve any interference that occurs.

NPSTC supports the LMCC recommendations to help ensure that terrestrial communications supporting public safety and critical industrial/business operations at 460-470 MHz be protected if Resolution 766 moves forward. Ensuring the communications for terrestrial

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2 A full description of these recommendations appears in the LMCC letter, May 19, 2017.
public safety and critical industrial/business users are protected from interference is essential to
the nation’s safety and economy.

Respectfully submitted,

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cc:
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Designated FCC Representatives to IWG-2 and IWG-3