



NPSTC 700 MHz D Block Comments & Reply Comments to 3rd NPRM

David Buchanan, Chair

November 18, 2008

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

NPSTC 700 MHz Comments Filed 11/3/08

Key Points



- Reaffirms support for public/private partnership
- Asks FCC to expand local build out alternative for regions unsold, sold w/o buildout by year 4, and in areas where no service exists
- Wants more options to enhance reliability, robustness and hardening
- Proposes revising priority access rules to reflect local needs
- Urges FCC to require regional licensees to form a national governance structure with which the PSBL can negotiate
- Emphasizes underfunded PSBL is detrimental to public safety and asks FCC to re-examine proposed \$5M annual cap on PSBL
- Notes lack of NPSTC consensus on proposed PSBL election rules
- Recommends additional service rate options
- Urges FCC to re-examine CII prohibitions in light of incident response
- Recommends cache of deployable 700 MHz BB terrestrial base stations for use in rural areas when needed
- NB Relocation: Suggests FCC solicit cost info from each agency and that cap encompass all costs related to the relocation

NPSTC 700 MHz Reply Comments Filed 11/12/08

Key Points



- Addresses balance of public-private partnership and local involvement
- Recommends a coordinated commitment among the PSBL, D Block licensee(s) and local agencies for early deployment
- Supports 4 G technology and notes that the chosen technology needs to be ready for deployment in 2010
- Urges FCC to address gap in interim funding so PSBL can adequately engage in negotiations with D licensee(s)
- Emphasizes need for adequate funding to support NB relocation; recommends giving D block licensees auction credit for relo funding

Process



- Participants: Multiple Committee & Gov Board members
- Approval: Entire NPSTC Board
- Comments: FCC deadline provided a month to develop
 - Calls 10/1, 10/9, 10/15, 10/21, 11/3
 - 3 successive drafts reviewed and edited
 - Final draft to Gov. Board 10/24 for review & approval
 - Comments submitted to FCC 11/3
- Replies: FCC deadline provided only 9 days to develop
 - Preliminary Email 11/5
 - Calls: 11/7, 11/11
 - Final draft to Gov. Board 11/11
 - Reply Comments submitted to FCC 11/12