

Nassau County



Police Department

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PATRICK J. RYDER
POLICE COMMISSIONER

January 23, 2019

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

Re: GN Docket No. 17-183, *Expanding Flexible Use in Mid-Band Spectrum between 3.7 and 24 GHz*
ET Docket No. 18-295, *Unlicensed Use of the 6 GHz Band*
Ex Parte Communication

Dear Ms. Dortch:

I am filing this letter on behalf of the Nassau County Police Department, NY.

The Nassau County Police Department's (NCPD) key mission objectives are to provide safety, security and emergency medical responses to the Nassau County, NY, community that consists of a population of approximately 1.36M (2017) covering approximately 453 land and water square miles. NCPD employs approximately 2,400 sworn police officers and 1,100 civilian personnel.

Fundamental to the NCPD's public safety agency mission success are a robust, fault tolerant, interference free and highly reliable wireless voice communications systems. The NCPD currently utilizes a thirty (30) channel, 500 MHz, digital, 12.5 KHz, a 16 channel 800 MHz and an 18 channel 700 MHz, P25, simulcast, trunking systems. A significant portion of NCPD's primary transport for these public safety communications systems is a 6 GHz microwave system. It consists of approximately 30 links/paths that interconnect approximately 18 radio sites and PSAPs. The criticality of this existing 6 GHz microwave system cannot be overstated. The FCC's proposal to allow unlicensed users within the 6 GHz frequency bands does not contribute to the stability, reliability or dependability of NCPD communications, and, in fact, it puts our vital communications more at risk. Any outage or degradation of service to the 6 GHz microwave system puts NCPD police officers, and the citizens and visitors of Nassau County, NY, at greater risk.

The FCC has assisted the NCPD numerous times with investigations toward the identification and resolution of interference issues impacting our communications systems. Although we are appreciative of the FCC's assistance, it is nonetheless a very time consuming process that requires significant, and sparse, personnel and time resources on the part of both NCPD and the FCC. To now add the potential for interference from non-licensed devices and users in the 6 GHz band is very disconcerting, and is contrary to protecting public safety communications frequencies, including fixed link adjacent channels.

The NCPD is hopeful that the FCC will see the need for properly coordinated and licensed radio infrastructure including the 6 GHz frequency band and not move forward with the proposed plan of allowing unlicensed devices and users on the 6 GHz frequency band. We believe this will provide us with the best chance of limiting interference to our critical public safety communication systems which helps to ensure continued prompt and effective responses to requests for police officer assistance from our citizenry and visitors of Nassau County, NY.

Thank you for your consideration in this matter.

Respectfully submitted,

Elizabeth Bella
Assistant Director – 911 Communications
Nassau County Police Department
Nassau County, NY