

**Before the
Federal Communications Commission
Washington, D.C. 20054**

In the Matter of)
) WT Docket No. 02-378
Region 42 (Virginia) 700 MHz Regional Plan Amendment)

COMMENTS OF THE COMMONWEALTH OF VIRGINIA

The Commonwealth of Virginia, Department of State Police (“Commonwealth”), by its counsel, hereby submits comments on behalf of its Statewide Agencies Radio System (“STARS”) in response to the Commission’s Public Notice issued June 23, 2016 (DA 16-710) in the above matter, on proposed amendments to the Region 42 700 MHz Public Safety Radio Communications Plan.

INTRODUCTION

STARS is a twenty-two state and local agency public safety grade statewide integrated voice and data system. STARS uses a digital trunked VHF narrowband infrastructure, which relies heavily on a cross band 700 MHz digital vehicular repeater system (DVRS) in over 3,300 public safety vehicles to support public safety communications using portable radios. The Commonwealth, on behalf of STARS, wishes to offer comments in support of the proposed modifications to the Region 42 700 MHz Public Safety Plan for General Use Spectrum in the 769-775/799-805 MHz Band (the “Plan Amendments”),

COMMENTS

The Commonwealth applauds the efforts of the Region 42 700 MHz Regional Planning Committee in designing a 700 MHz regional plan modification which meets the public safety needs of the Region.

Given the intense demand for frequencies in the mid-Atlantic region, reaching a consensus with all adjacent regions on public safety channel allocations is not an easy task.

In this case, each of Region 17 (Kentucky), Region 20 (Maryland, DC, northern Virginia), Region 28 (eastern Pennsylvania, southern New Jersey, Delaware), Region 31 (North Carolina), Region 36 (western Pennsylvania), Region 39 (Tennessee) and Region 44 (West Virginia) have consented to the Region 42 revised Plan.

The Commonwealth believes that Regional Planning Committee's amended Region 42 700 MHz Plan, including reserve channel allotments, provides for a reasonable and balanced channel allocation.

The Commonwealth is satisfied with the reserve channel allotments in the Region 42 700 MHz Plan.

Since not only all participating jurisdictions in Region 42, but also all adjacent regions, have agreed to the amendments, the Commonwealth urges the Commission to accept the Plan.

CONCLUSION

The modified Region 42 Plan meets the public safety needs of the Region and has been agreed to by all the participating jurisdictions and surrounding 700 MHz Regional Planning Committees. Given this unanimous support, the Commission should accept the Plan.

Respectfully submitted,

COMMONWEALTH OF VIRGINIA
DEPARTMENT OF STATE POLICE

By 
Peter E. Broadbent, Jr. (VSB 15962)
Christian & Barton, L.L.P.
909 E. Main Street, Suite 1200
Richmond, VA 23219
(804) 697-4109
Attorney for Commonwealth of Virginia
Department of State Police

Dated: June 27, 2016

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of June, 2016, a copy of the foregoing Comments of the Commonwealth of Virginia was sent by email to john.evanoff@fcc.gov.



Peter E. Broadbent, Jr.