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

In the Matter of	)
	)
Procedures for Commission Review of State	) PS Docket No. 16-269
Opt-Out Requests from the FirstNet Radio	)
Access Network	)

COMMENTS OF AMERICA'S PUBLIC TELEVISION STATIONS

America's Public Television Stations ("APTS")[1] submit these comments to discuss the

critical role that public television stations can play in the FirstNet public safety network.

Although these comments do not directly address the Federal Communications Commission's

("Commission") proposed parameters and timelines for the states that opt-out of FirstNet, APTS

believes these comments will be helpful to the Commission's record in this proceeding.

Public television is capable of leveraging its nationwide network of high-power broadcast

television stations in conjunction with digital datacasting to create a nationwide wireless IP

delivery network that is natively one-to-many, in order to improve first responder access to

critical information during emergencies. In this way, public television may serve as a

complementary system with the FirstNet LTE network.

The public television system, operating in all fifty states and territories, has committed in

principle to designate 1 Mbps of its channel capacity to provide a nationwide communications

network for the FirstNet public safety initiative. The public television stations make this

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[1] APTS is a non-profit organization whose membership comprises the licensees of nearly all of the
nation's CPB-qualified noncommercial educational television stations. The APTS mission is to support
the continued growth and development of a strong and financially sound noncommercial television
service for the American public.

commitment through APTS in association with SpectraRep, who has been its partner for public

safety communications in a number of markets for many years.[2]

Public television stations are designed as a communications hub, which allows for

content aggregation from a remote command, state or national government agency and

distribution over a local TV station for a last mile delivery to first responders. Datacasting

utilizes existing broadcast television structure to allow for the transmission of public safety

communications reliably, while creating a new capability that conserves LTE bandwidth by

seamlessly moving content destined for multiple recipients onto the most efficient multicast path.

Public television reaches 97 percent of the population of the U.S. and territories, which is

particularly important for rural coverage in developing the FirstNet system. Further, because it

broadcasts one-to many, public safety datacasting over public television is not subject to

congestion. Public broadcasters have invested heavily in content backhaul, satellite, fiber,

portable uplinks, vertical real estate and other assets, creating a strong backbone for the

datacasting service.

Public television and datacasting can complement FirstNet by providing additional

licensed spectrum that is already built-out and operational, natively one-to-many without

overload, and already serving all rural communities. It can be integrated with LTE to provide

seamless service to end users. Use of public television broadcasting and datacasting can offer

improved performance, higher deployment speeds, and reduced costs to the FirstNet LTE

network and first responders.

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[2] SpectraRep, which is responsible for the development of datacasting, is a small business company working with public television stations throughout the US to provide a robust wireless data delivery network.

Attached is the APTS and SpectraRep *Capabilities Statement - Datacasting as a Complement to FirstNet*, which will provide more information on the possibilities and benefits of using public television and datacasting with the FirstNet system.

Respectfully submitted,

/s/ Lonna Thompson

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