

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of	)	
	)	
Expanding Flexible Use in Mid Band Spectrum	)	GN Docket No. 17-183
Between 3.7 and 24 GHz	)	
	)	
	)	

**REPLY COMMENTS OF THE REGIONAL WIRELESS COOPERATIVE**

The Regional Wireless Cooperative (RWC), through counsel and pursuant to Section 1.415(c), hereby respectfully submits these Reply Comments in response to the Comments submitted by various parties in the above-referenced proceeding.

The RWC is a cooperative body formed under an Intergovernmental Agreement. Membership is open to all local, county, state, federal and tribal governmental entities. The RWC provides seamless interoperability for 20 cities, towns and fire districts located in the Phoenix Arizona metropolitan region by operating a Public Safety Radio Network over an 11,000-square mile coverage area.

The RWC operates over 80 Fixed microwave paths which carry mission critical public safety traffic, of which over 20 operate in the 5.925-6.425 GHz band. Large amounts of public tax dollars have been invested in these critical communications links to engineer and build them to meet 5 nines of reliability. This high level of reliability is the standard when failure is not an option and the safety of the public stands in the balance.

The RWC has reviewed a number of comments already filed in this proceeding, most significantly those comments by the National Public Safety Telecommunications Council (NPSTC) and the Joint Comments submitted by Los Angeles County, California, Kansas City, Kansas, the City of Denver, Colorado and Ozaukee County, Wisconsin. The RWC agrees with the concerns expressed in those comments about the potential for interference that any attempt to

employ untested flexible sharing into the 6 GHz band would cause. The RWC also agrees that procedures do not currently exist to detect and mitigate such interference should it occur.

Should the 6 GHz band be allowed to become saturated with unlicensed shared users, the result will be a rise in the noise floor to the point that incumbents licensed fixed stations will become degraded and unreliable. The RWC also agrees that forced relocation is not an option. Since Public Safety has already been pushed out of the 1.8 to 2 GHz band there is simply nowhere else to go for reliable backhaul over long distances. 6 GHz facilities are the norm in the West to span the long distances many of our facilities require. 11 GHz paths simply do not work reliably enough over the longer distances that some paths require due to seasonal atmospheric ducting, inversion layer anomalies, and strong Monsoon rainstorms.

The RWC supports any procedures to be developed which will ensure that flexible use of bands adjacent to its 6 GHz microwave links are effective in reducing interference to incumbents and do not involve increased costs to Public Safety. WHEREFORE, the premises considered, it is respectfully requested that the Commission act in accordance with the views expressed herein.

Respectfully submitted,

REGIONAL WIRELESS COOPERATIVE

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