

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

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

REPLY COMMENTS OF THE TEXAS 9-1-1 ENTITIES

The Texas 9-1-1 Alliance,¹ the Texas Commission on State Emergency Communications,² and the Municipal Emergency Communication Districts Association³ (collectively, the “Texas 9-1-1 Entities”) respectfully submit the following brief reply comments on the Federal Communication Commission’s (the “Commission’s”) Mid-Band Spectrum Exploration Notice of Inquiry (“Mid-Band NOI”) in the above-referenced proceeding.⁴

¹ The Texas 9-1-1 Alliance is an interlocal cooperation entity composed of 26 Texas emergency communication districts with E9-1-1 service and related public safety responsibility for more than approximately 63% of the population of Texas. These emergency communication districts were created pursuant to Texas Health and Safety Code Chapter 772 and are defined under Texas Health and Safety Code Section 771.001(3)(B).

² The Texas Commission on State Emergency Communications (“CSEC”) is a state agency created pursuant to Texas Health and Safety Code Chapter 771, and by statute is the state program authority on emergency communications. CSEC’s membership includes representatives of the Texas 9-1-1 Entities and the general public, and directly oversees and administers the Texas state 9-1-1 program under which 9-1-1 service is provided in 81% of Texas’ 254 counties, covering approximately 22% of the state’s population.

³ The Municipal Emergency Communication Districts Association (“MECDA”) is an association of 26 municipal emergency communication districts, as defined under Texas Health and Safety Code Section 771.001(3)(A), that are located primarily in the Dallas-Fort Worth area.

⁴ See *Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz*, GN Docket No. 17-183, Notice of Inquiry, 32 FCC Rcd 6373 (2017) (rel. Aug. 3, 2017) (*available at https://apps.fcc.gov/edocs_public/attachmatch/FCC-17-104A1.pdf*).

I. Reply Comments

In their initial comments, LCRA, the Joint Commenters, APCO, and AT&T raise potential public safety and critical infrastructure concerns associated with Mid-Band use changes.⁵ These same public safety and critical infrastructure concerns also apply to the delivery of 9-1-1 calls (or 9-1-1 text messages, as applicable), because Mid-Band spectrum applications currently include use (or near-term planned use) as part of microwave backup paths for the delivery of 9-1-1 service.⁶ Accordingly, the Texas 9-1-1 Entities support the concerns raised by LCRA, the Joint Commenters, APCO, and AT&T, and urge the Commission, in addition to considering other public safety and critical infrastructure concerns associated with Mid-Band spectrum use changes, to also specifically consider the impact of any such changes on the delivery of 9-1-1 service.

⁵ See, the Lower Colorado River Authority (“LCRA”) Initial Comments at p. 4 (“... LCRA has significant concerns about opening up the Lower 6 GHz and Upper 6 GHz bands for unlicensed and licensed wireless broadband.”) (available at [https://ecfsapi.fcc.gov/file/1002142073229/LCRA%3B%20FINAL_Mid-Band_NOI_Comments_\(GN_Docket_17-183\).pdf](https://ecfsapi.fcc.gov/file/1002142073229/LCRA%3B%20FINAL_Mid-Band_NOI_Comments_(GN_Docket_17-183).pdf)); Los Angeles County, California, the City and County of Denver, Colorado, the City of Kansas City, Missouri, Ozaukee County, Wisconsin and the Government Wireless Technology & Communications Association (“GWTCA”) (jointly, the “Joint Commenters”) Initial Comments at p. 4 (“[T]he Joint Commenters have microwave interests in the 6 GHz, and thus are extremely concerned about the potential of interference to these operations, which are crucial to public safety.”) (available at <https://ecfsapi.fcc.gov/file/1002192526516/Joint%20Mid-Band%20Comments.pdf>); the Association of Public-Safety Communications Officials-International, Inc. (“APCO”) Initial Comments at p. ii (“If the 6 GHz bands are repurposed or become unsuitable, public safety will lack viable alternatives.”) (available at <https://ecfsapi.fcc.gov/file/100298799207/APCO%20comments%20Mid%20Spectrum%20NOI%20Oct2017.pdf>); and AT&T Services, Inc. (“AT&T”) Initial Comments at p. 14 (“There is a long list of technical reasons why 6 GHz microwave remains a critical component of the Nation’s communications networks.”) (available at <https://ecfsapi.fcc.gov/file/1002183914322/ATT%20Mid%20Band%20NOI%20Comments-FINAL.pdf>).

⁶ For example, (1) the Denco Area 9-1-1 District operates seven 6.175 GHz hops as part of a larger microwave infrastructure as backup call-paths for 9-1-1 calls and text messaging, as well as for Land Mobile Radio interoperability channels operated by a county; (2) the Panhandle Regional Planning Commission uses microwave long haul as a redundant path to the copper T1’s used as primary; and (3) the South East Texas Regional Planning Commission is in the process of turning up a redundant microwave system for their hosted remote 9-1-1 CPE network.

II. Conclusion

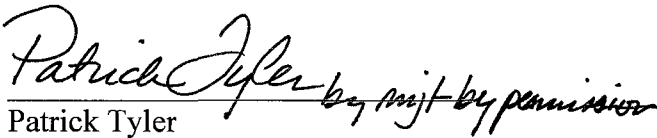
The Texas 9-1-1 Entities appreciate the opportunity to provide the foregoing reply comments on these Mid-Band NOI matters, and respectfully request that the Commission take action in a manner consistent with these reply comments.

Respectfully submitted,



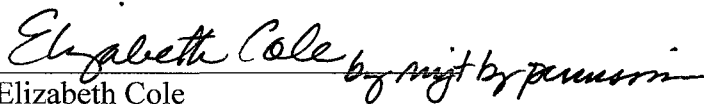
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On the comments:

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