

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

**RECEIVED  
DEC 19 1996  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY**

In the Matter of )  
)  
The Development of Operational, Technical, and )  
Spectrum Requirements for Meeting Federal, State ) WT Docket No. 96-86  
and Local Public Safety Agency Communications )  
Requirements Through the Year 2010 )

To: The Commission

**DOCKET FILE COPY ORIGINAL**

**REPLY COMMENTS OF THE COUNTY OF LOS ANGELES**

The County of Los Angeles (the "County") hereby submits the following Reply to comments filed in response to the Commission's Notice of Proposed Rulemaking in the above-captioned proceeding.

The County supports the many comments filed by public safety agencies and organizations that call on the FCC to take immediate and decisive action to satisfy the spectrum requirements identified by the Public Safety Wireless Advisory Committee ("PSWAC"). These reply comments will address a few additional issues that are of particular concern to the County.

First, the County agrees with APCO and others that all public safety agencies should be encouraged to adopt spectrum efficient systems appropriate for their operations. For many agencies, that will mean migrating to trunked, area wide systems. However, for others, the best approach may be to maintain conventional operations, due to the cost and complexity of trunking, which does not always yield greater spectrum efficiency. Thus, the County opposes the suggestion from Ericsson that conventional systems eventually

No. of Copies rec'd  
List ABCDE

029

become secondary. That would be tantamount to forcing an agency to adopt a trunked system, as no public safety agency can tolerate secondary status and the risk of radio interference to critical operations.

Second, the County reiterates its concern regarding the use of commercial services to meet mission-critical public safety communications needs. A few commercial service providers, such as Nextel, suggest in their comments they can provide a wide range of public safety communications over their commercial systems. That is true only to a limited degree. Most public safety operations require a level of coverage, reliability, control, priority, and security that would be uneconomic for a commercial service provider to maintain. For example, the County's public safety communications systems necessarily provide nearly ubiquitous coverage throughout the County's expansive and varied terrain, which includes mountain peaks, isolated valleys, the vast Los Angeles Basin, and Catalina Island. Moreover, these systems are designed and maintained to handle peak emergency capacity without disruption and to withstand earthquakes, wildfires, and other disasters to which Southern California is susceptible. We are unaware of any commercial radio service that provides that same level of service, nor do we expect that it would be feasible for such service to be provided on a commercial basis.

Third, the County agrees with APCO that the best immediate opportunity for the FCC to address the public safety needs identified by PSWAC would be to reallocate to public safety a portion of the spectrum now occupied by UHF television channels 60-69. However, we also agree with APCO, the State of California and others that the Commission must also allocate public safety spectrum below 512 MHz, adjacent to the current VHF high band and UHF low band public safety spectrum allocations. The State

of California notes that it would be extraordinarily difficult, and expensive for it to implement a state-wide communications system at frequencies above 512 MHz .

Finally, the County does not support the suggestion by the Federal Law Enforcement Wireless Uses Group ("FLEWUG") that all public safety spectrum management be shifted to NTIA. The FCC, as an independent regulatory body, is a far preferable source of state and local government frequency licenses and spectrum allocations than an Executive Branch agency such as NTIA. The County agrees that there is considerable room for improvement in the coordination of federal, state, and local public safety spectrum management. However, shifting state and local government licensing and frequency management to the Executive Branch is not the correct solution.

For the reasons stated above and in its initial comments, the County of Los Angeles urges the Commission move forward to address public safety spectrum requirements as identified by PSWAC.

Respectfully submitted,

COUNTY OF LOS ANGELES

By:

  
Robert M. Gurss  
WILKES, ARTIS, HEDRICK &  
LANE, Chartered  
1666 K Street, N.W. #1100  
Washington, D.C. 20006  
(202) 457-7329

Its Attorney

December 19, 1996