Secretary ope.
MM 87-268

Federal Communications Commission
Washington, D.C. 20554

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Federal Communications Commission
Office of Secretary

The Honorable Robert G. Torricelli
United States Senator
One Newark Center
16th floor
Newark, New Jersey 07102

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Dear Senator Torricelli:

Thank you for your letter of February 29, 1997, on behalf of your constituent, Mr. Herbert E. Steelman, Director of the Department of Public Safety, Camden County, New Jersey. Mr. Steelman is concerned about the Commission's plans to reallocate the current UHF broadcast television channels. Mr. Steelman expresses concern that the Commission's proposal to assign a second television channel to each existing television station would have a detrimental impact on land mobile operators in the New Jersey area and possibly result in a severe financial impact on Camden County, New Jersey and the surrounding townships. Specifically he is concerned about interference to channels 19 and 20, currently used by public safety services in the Philadelphia/New Jersey area, due to the proposed use of channel 21 by digital television (DTV) in Vineland, New Jersey.

On July 25, 1996, the Commission proposed policies for allotting channels for DTV service and also provided a draft DTV Table of Allotments. (Sixth Further Notice of Proposed Rule Making in MM Docket No. 87-268, FCC No. 96-317, released August 14, 1996). In that action, the Commission proposed to provide all existing television broadcasters with a second 6 MHz channel for digital broadcasting. The Commission's plan for allotment of DTV channels would maintain the channels currently used for land mobile operations in a number of major markets, including channels 19 and 20 in the Philadelphia and adjacent New Jersey region. While our draft DTV Table would provide for use of channel 21 in Vineland, New Jersey, we believe that engineering solutions are available for avoiding interference between DTV and land mobile operations on adjacent frequencies. At the same time, we understand the potential for interference between existing land mobile services and new DTV operations in the Philadelphia/New Jersey region. Please be assured that we are carefully evaluating all available alternatives for maintaining the interests of land mobile operators as well as broadcasters as we develop the DTV Table of Allotments.

Thank you for your interest in this matter.

Sincerely,

Richard M. Smith

Richard M. Smith
Chief
Office of Engineering and Technology

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ROBERT G.TORRICELLI
NEW JERSEY

WASHINGTON OFFICE:
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LATEST TEXT FROM BRUCE ?

Senate
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9, 1997

Chairman I
Federal Communications Commission
1919 M Street NW
Room 808
Washington, D.C. 20554

Dear Chairman Hundt:

I am writing on behalf of Mr. Herbert E. Steelman, Camden County Department of Public Safety Director. Mr. Steelman expresses his concerns regarding the effect on emergency service communications as a result of the Commission's proposal that establishes tentative policies for developing the initial digital television. Enclosed for your review is Director Steelman's correspondence dated November 12, 1996. Camden County strongly opposes any action to reallocate the current UHF broadcast television channels.

It is my understanding that such action could effect not only Camden County but the police operation of several Counties. I would hope that this matter is given every consideration and that, alternative solutions are also being explored.

Thank you in advance for your time and consideration in this matter. Please forward all correspondence to Michael P. Flynn, at One Newark Center, 16th floor, Newark, N.J. 07102. .

Sincerely,

ROBERT G. TORRICELLI
United States Senator

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DEPARTMENT of PUBLIC SAFETY

ANNETTE CASTIGLIONE-DEGAN
*Freeholder*

HERBERT B. STEELMAN
*Director*

**Camden County**
*CHARLES J. DEPALMA COMPLEX*
*2311 Egg Harbor Road*
*Lindenwold, New Jersey 08021*
*(609) 783-4808 Fax: (609) 435-2760*

Secretary, Federal Communication Commission November 12, 1996
1919 M. Street NW
Room 222
Washington, DC 20554

Re: Advance Television System MM Docket no.87-268
and their impact upon the
Existing Television Broadcast Service

Dear Chairman Hundt:

Camden County Public Safety is very concerned with the pending action possible by FCC to reallocate the current UHF broadcast television channels.

Our reason of concern is very simply, that we dispatch emergencies over 20 two way radio channels covering 227 square miles and 14.3 miles of navigable waterfront with 17 different repeater sites. Our UHF radio channels are on TV Channels 19 & 20.

Our radio system is used by thirty of the thirty-seven municipalities in Camden County along with three County Police agencies everyday as their main and only communication system.

The other seven towns along with other police agencies such as; Patco, FBI, US Marshall office, Regional School district, etc, use these frequencies to enhance communication with Camden County Public Safety.

Our radio network is responsible for over 500 mobile radios and approximately 3000 portable radios of the agencies that we provide dispatch service to, not to mention the other police agencies, which the amount of radios is unknown.

Our activity on radio escalates every year by a substantial amount, in 1994 we dispatched 213,308 police calls compared to 182,955 in 1993. Last year in 1995 there were 230,455 calls and this year we are averaging 663 calls per day. These numbers reflect the amount of calls, not the amount of radio transmissions. Each police call requires at least four radio transmission for each call.

As you can see, the loss of these radio channels will create a serious problem for the public safety agencies in Camden County. Not only would this be a nightmare, trying to re-establish communications on a different spectrum but it also would not be fair to the taxpayers in Camden County, who recently paid for the radio change from VHF to UHF in late 1980's and early 90's.

Additionally, a move to a higher band will create the need for more equipment as the higher bands do not have the same covering distance as the lower bands.

We sincerely hope that a decision is made **NOT TO REALLOCATE** these channels for Digital Television. It is imperative that we stay on our existing channels for the safety of the residents in Camden County.

Another area of concern is the relocating of TV Channel 65 to channel 21. This is a major concern to us, as TV 65 is located in Waterford Twp in Camden County. This will definitely cause substantial interference on TV 20. Again we plea to you, **Do Not Give Permission** for this to take place. This will cause serious safety problems in Camden County.

In theory, if the television broadcasters are successful in convincing FCC to reallocate these channels, please advise what will take place; where does that leave Camden County Public Safety and all the municipalities that depend on us for communications ?

How and where are we suppose to coordinate two way communications for Camden County Public Safety agencies ?

Who is responsible to fund the reallocating to a higher band ?

If each agency is left to fend for themselves, will there be any relief funds available ?

Moving to a higher spectrum will cause the need for additional radio equipment in order to duplicate the coverage we have already established with the UHF system. Will funds be available to handle the additional expense ?

Thank you for your attention to this serious matter and your time and concern for Public Safety in Camden County.

Sincerely,

Herbert E. Steelman

Director Herbert E. Steelman
Camden County Public Safety