

MAJOR CITIES CHIEFS

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In the Matter of

the Development of Operational, Technical, and Spectrum Requirements for Meeting Federal, State and Local Public Safety Agency Communication requirements Through the Year 2010

WT Docket No. 96-86

Reply Comments of the Major Cities Chiefs

In reference to the recent Federal Communication Commission proceedings 96-86 Second Further Notice, the Major Cities Chiefs Association respectfully requests the Commission to include these comments, even though late, due to the fact that this Association has just completed its Winter meeting with 46 Chief executives in attendance where this matter was presented and unanimously approved.

The recent study by the Public Safety Wireless Advisory Committee (PSWAC) indicated that Public Safety will need an additional 73 MHZ over and above the already identified 24 MHZ in the next 15 years.

Public Safety was broadly defined to include Police, Fire, Emergency Medical Service, Highway and Forestry/Conservation. But, there is an effort by some other non-government entities to get themselves included under the public safety definition.

The immediate issue is: how will the 24 MHZ be assigned for various uses such as Voice, data, Video, interoperability etc.

APCO, which has represented the law enforcement community throughout this long struggle, supports continuing the regional planning approach which has worked very well in the past. Some of our Eastern Police networks are interstate with the focal point being the larger cities, e.g., New York, Philadelphia, Chicago, Boston, Washington.

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However, some in Fire and Forestry want the states to control this process. We disagree with this approach.

There are also a range of important technical issues regarding the broadcasters leaving spectrum or sharing new spectrum.

APCO has provided coordination for all public safety in the 806 band for more than the past decade. APCO has applied to be the coordinator and to bear the start up costs.

The Major Cities Chiefs Association supports:

1. The Regional Planning Concept
2. The application of APCO to act as coordinator
3. Immediate action by the FCC to take whatever steps are necessary to clear broadcast incumbents from this new spectrum now assigned to public safety. And, that the FCC refrain from making interim DTV assignments in this spectrum in the top 50 major metropolitan areas of this country.

The ability of all public safety agencies to communicate during emergencies is a critical issue for us. As important is the need to follow through on the PSWAC study recommendations to allocate the needed additional spectrum for public safety communications.

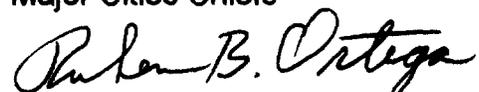
The private sector recognizes the priceless value of the very limited supply of radio spectrum for the future of communications businesses.

All we in the Major Law enforcement Communities have going for us is the Public Safety Mandate.

We believe public safety is and will continue to be of critical importance to the public we serve and to our elected leaders.

We request the commissions favorable consideration and support for these recommendations.

Respectfully submitted,
Major Cities Chiefs



Ruben B. Ortega, Chairman
Chief, Salt Lake City

Dated: February 18, 1998