



National Regional Planning Council

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BEFORE THE FEDERAL COMMUNICATIONS COMMISSION WASHINGTON, D.C. 20554

National Public Safety Telecommunications Council Petition for Rulemaking
On Aircraft Voice Operations at 700 MHz RM-11433

Petition for Clarification

National Regional Planning Council

The FCC's Report and Order (FCC 14-172) adopted October 17, 2014 under Docket 13-87 and RM-11433 (Paragraphs 13-21) provides background and discussion on a number of issues associated with the redesignation of 700 MHz narrowband Secondary Trunked Channels 21-22, 101-102, 181-182, 261-262, 659-660, 739-740, 819-820 and 899-900. The National Regional planning Council (NRPC) supports the reclassification of these channels as their limited use thus far in the public safety nationwide build-out of 700 MHz makes them excellent candidates for Air to Ground use. Lastly, the Report and Order places the responsibility of coordinating these new Air to Ground channels to the states. On behalf of the NRPC, should a state interoperability body feel it cannot meet the responsibilities associated with the administration of these channels as designated by the Commission and it seeks to have these responsibilities transferred to their respective 700 MHz Regional Planning Committee(s), the NRPC stands ready to work with each respective 700 MHz Regional Planning Committee to ensure that the Air to Ground channels are coordinated within each region to meet the needs of the users.

The NRPC seeks clarification as to whether new Air to Ground 700 MHz Narrowband channels (formerly Secondary Trunked Channels) are subject to the trunking requirements for the use of six (6) channels or more as stated in 90.537 (a). While the Commission has provided in the Report and Order opportunities for these Air to Ground channels to be utilized in either the trunked or conventional mode, the NRPC feels that the use of these channels in anticipated public safety Air to Ground implementations should be exempted from Rule 90.537 (a) in which the use of six (6) or more narrowband channels must be used in the trunked mode of operation. The NRPC feels that operationally these Air to Ground channels may be best utilized in both conventional and trunked configurations. While the use of these channels may be included in public safety 700 MHz trunked systems, the NRPC feels

that a considerable portion of Air to Ground channel usage will be implemented in the conventional mode and for these channels to be subject to Rule 90.537 (a) may hamper effective conventional use of these channels.

Thank you for your consideration of this request for clarification.

Regards

A handwritten signature in cursive script, appearing to read "William J. Carter". The signature is written in black ink and is positioned above the typed name.

William, Chairperson, Chairperson
National Regional Planning Council

January 8, 2015