



NATIONAL PUBLIC SAFETY TELECOMMUNICATIONS COUNCIL



February 13, 2015

David G. Simpson
Rear Admiral (ret.), U.S. Navy
Chief, Public Safety & Homeland Security Bureau
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: PS Docket No. 13-87 and WT Docket No. 02-378

Dear Admiral Simpson,

The National Public Safety Telecommunications Council (NPSTC) and the National Regional Planning Council (NRPC) thank the Commission for the opportunity to jointly file the following information consistent with the FCC Report and Order (14-172) adopted October 17, 2014 regarding the designation of former 700 MHz Reserve Channels for nationwide deployable system channels.

NPSTC and NRPC formed a joint working group that met to examine a variety of concerns involving this issue. In its order, the FCC specifically asked NPSTC and NRPC to recommend up to eight channels that would be allocated for deployable trunked radio networks. The list of channels identified in this joint letter is the result of public safety and industry collaboration. The following parameters were taken into consideration by the joint working group as they worked to make their recommendation:

1. Minimum channel separation of 150 KHz for combiner suitability
2. Ability to use U.S Primary Channels in the Mexican and Canadian Border Areas
3. Use of as many common channels as possible between border and non-border areas.

The application of these criteria led the working group to recommend a set of six (6) channels to be allocated nationwide for 700 MHz deployable systems¹. While the Report and Order indicated that up to eight (8) channels could be selected for deployable use, these six channels have the most commonality nationwide. They also meet all of the criteria listed above.

¹ Only 4 of the six channels are available for use in Canada Sector 2. The working Group was unable to find more than 4 usable channels in that border sector under the current sharing agreements with Canada.

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NPSTC/NRPC Recommended Channel Allocation Deployable 700 MHz Trunked Systems			
CH#	Channel Numbers	12.5 kHz Center Frequency	Channel Spacing (kHz)
1	37-38	769.23125	N/A
2	61-62	769.38125	150
3	117-118	769.73125	350
4	141-142	769.88125	150
5	² 883-884	774.51875 CC-P	4500
6	³ 939-940	774.86875 CC-A	350

The working group provided the recommended channel list to the Telecommunications Industry Association (TIA) and requested their review of the channel recommendations on behalf of the manufacturing community. TIA responded and noted that the proposed channel plan was workable. They also provided an alternate plan that allowed greater channel spacing which would allow the use of less expensive transmit combiners. This trade off was at the expense of usable channels in the border areas and the working group felt that having a common set of channels with sufficient border coverage was the more important consideration. The working group also examined a proposal for two separate sets of eight channels that would provide eight for the U.S. and the border areas (except Canada Sector 2). This option suffered from additional operational complexity that was not worth the increase in capacity of the deployable trunked system.

The workgroup considered alternative plans and the consensus of the group was that the six channel plan presented above is the most optimal because:

1. It was operationally simple;
2. It will have enough capacity to handle vast majority of incidents that need a deployable trunk system; and,

² Channel 883-884 is designated Primary Control Channel for nationwide deployable system

³ Channel 939-940 is designated Alternate Control Channel for nationwide deployable system

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3. The channels are usable in all geographical areas of the nation excepting the Canada sharing Sector 2⁴ area.

It was also noted that public safety agencies could work directly with their local Regional Planning Committee if more than six channels were needed for their deployable trunked system. This collaboration would accommodate the needs of large agencies while not removing additional channels from the available pool nationwide.

NPSTC and the NRPC are jointly working on a number of operational issues regarding deployable trunked radio systems, including identification of a common system key, common interoperable talk group names, and other technical matters. This additional work will help enhance the effective use of these systems nationwide.

NPSTC and NRPC thank the Commission for their actions in the Report and Order that lead to improved public safety communications within the 700 MHz band.

Sincerely,



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⁴ It is recommended that the FCC have future discussions with Canada over increased sharing of these channels to support interoperable trunked solutions along the Sector 2 border area.

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NPSTC/NRPC Proposal #1 RECOMMENDED	Common channel selections for each area			
Channels	Mexico Border Zone	Canada Sharing Zone	Canada Sector 1	Canada Sector 2
37-38	Y	Y	Y	Y
61-62	Y	Y	Y	Y
117-118	Y	Y	Y	N
141-142	Y	Y	Y	N
883-884	Y	Y	Y	Y
939-940	Y	Y	Y	Y
Total usable	6	6	6	4

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NPSTC/NRPC Proposal #2 NOT RECOMMENDED	Different channel selections for each area			
Channels	Mexico Border Zone	Canada Sharing Zone	Canada Sector 1	Canada Sector 2
37-38	Y	Y	Y	Y
61-62	Y	Y	Y	Y
117-118	Y	Y	Y	N
141-142	Y	Y	Y	N
197-198	Y	N	Y	N
237-238	Y	N	Y	N
883-884	Y	Y	Y	Y
939-940	Y	Y	Y	Y
803-804	N	Y	N	N
859-860	N	Y	N	N
Total usable	8	8	8	4

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TIA Proposal NOT RECOMMENDED	Different channel selections for each area			
Channels	Mexico Border Zone	Canada Sharing Zone	Canada Sector 1	Canada Sector 2
61-62	Y	Y	Y	Y
141-142	Y	Y	Y	N
221-222	Y	N	Y	N
301-302	Y	N	Y	N
699-700	N	N	Y	N
779-780	N	N	Y	Y
859-860	N	Y	Y	N
939-940	Y	Y	Y	Y
Total Usable	5	4	8	3