

**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 Docket 13-87

Request for an Extension of Time

1. The National Regional Planning Council (NRPC) respectfully files this request for an Extension of Time under Docket 13-87 on behalf of 700 MHz Regional Planning Committees and their need to modify their existing 700 MHz Regional Plans. Due to the reassignment by the Commission of former 700 MHz Reserve Channels to General Use Channels for use as both Nationwide Deployable 700 MHz System channels and other General Use within each region, the requirement for the 700 MHz Regional Planning Committees to modify their regional plans within six (6) months of the publication of the Report and Order has been found to be an insufficient amount of time given the information each region must have to modify its 700 MHz plan.

The National Regional Planning Council

The National Regional planning Council (NRPC) is an advocacy body formed in 2007 that supports public safety communications spectrum management by Regional Planning Committees (RPC) in the 700 MHz and 800 MHz NPSPAC public safety spectrum as required by the Federal Communications Commission. We liaison with FCC certified frequency coordinators, licensees, applicants, vendors, adjacent regions as well as the Commission on a regular basis to ensure our planning responsibilities and the goals of those first responder agencies we serve are met. These Regional Planning Committees are made up of public safety volunteer members that dedicate their time, in addition to the time spent on their regular positions, to coordinate spectrum efficiently and effectively for the purpose of making it available to public safety agency applicants in their region. The work these people do reflects their dedication to public safety communications and to ensuring local public safety agencies and user needs are heard and met within their regions and beyond.

As a body that advocates the *voice* of regional planning committees and one that does not attempt to consolidate and centralize that voice into a single message, we encourage each region planning committee to voice their own opinions and speak to the Commission in filings and comments as best they can with the intimate knowledge they have as to initiatives in place and impacted within their own regions. Subsequently, the NRPC does not in this proceeding speak for each individual regional planning committee but recent national

regional planning meetings and discussion has highlighted specifically the need for this issue to be addressed by the Commission. We are hopeful that each regional planning committee will respond in our filing of this petition on their own behalf bringing their own viewpoints into consideration. We encourage each region to do so.

Discussion

The Report and Order (14-172) that requires the 700 MHz plan modifications was published in the Federal Register on December 2, 2014 making the deadline for each 700 MHz Regional Planning Committee to file amendments to its current 700 MHz plan with the Commission no later than June 2, 2015. Given the work recently completed and issued for Public Notice by the Commission as a results of joint efforts by the National Public Safety Telecommunications Council (NPSTC) and the National Regional Planning Council (NRPC) to identify new General Use channels for use in a Nationwide 700 MHz Deployable System, the modification of 700 MHz plans can only now begin to be initiated by 700 MHz regional planning committees as prior to these channels being identified there was insufficient information available to modify regional plans properly.

Now that sufficient information is available outlining the scope of the minimum number of channels that can be used for a 700 MHz nationwide deployable system, 700 MHz regions in both T-Band Areas and Non-T-Band areas of the country can begin to determine whether they will modify their plans accordingly and how they not only will plan to utilize the 700 MHz Nationwide Deployable Channels but also the remaining former Reserve channels that have been converted to General Use and the use of which are required to be reflected in the

proposed 700 MHz plan modification. For each plan modification, regions must determine the following:

- Whether or not the region is going to utilize the recommended six (6) former Reserve Channels (now Nationwide Deployable Channels) in their 700 MHz Regional Plan region.
- The manner in which they are going to utilize the remaining eighteen (18) former Reserve Channels in their 700 MHz Regional Plan.
- If they are a region with T Band incumbents, the region needs to develop a priority matrix to determine the most effective manner in implementing the former Reserve Channels, including channels recommended for use in the 700 MHz Nationwide Deployable System.
- Regions may need to publish technical and operational parameters and guidelines for usage of the national 700 MHz deployable system channels in their region should they elect to utilize Nationwide Deployable channels.
- If the 700 MHz region is one which is located in a state or states that have recently cancelled their 700 MHz Geographic State License, the 700 MHz region may want to consider the manner in which they will modify their current General Use channel allotments in their plan modification to accommodate the former State License Channels as they migrate to General Use Channels in that state.
- Regions that have taken responsibility to administer 700 MHz Air to Ground channel's (Former Secondary Trunked Channels) from their respective

State(s) may want to provide guidance and usage considerations in their plan modification.

Given the time necessary to modify a 700 MHz plan at the regional level, obtain approval within the region and submit the plan to adjacent region(s) for concurrence with potentially the information presented above, the NRPC requests an extension to the original plan modification date of June 2, 2015 to December 31, 2015. It is believed that this 6 month extension of time will allow sufficient time for regional planning committees to submit plan modifications to the Commission. For the reasons listed above, the NRPC requests an additional six (6) months for 700 MHz Regions to modify their plans with a deadline of January 1, 2016.

Respectfully,

William Carter, Chairperson

National Regional Planning Council

March 30, 2015