



June 8, 2015

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: WP Docket No. 15-32, RM-11572

Dear Ms. Dortch:

The National Public Safety Telecommunications Council (NPSTC) is a federation of public safety organizations whose mission is to improve public safety communications and interoperability through collaborative leadership. NPSTC pursues the role of resource and advocate for public safety organizations in the United States on matters relating to public safety telecommunications. Accordingly, NPSTC provides guidance on issues that can either negatively impact or benefit the operation of public safety communications.

In its Notice of Proposed Rulemaking in the above-captioned proceeding, the Commission proposed to create interstitial channels in the 800 MHz “mid-band” segment of 809-817/854-862 MHz. Under the proposal, interstitial channel centers would be placed halfway in-between the centers of current 25 kHz main channels in this segment of the band. Frequency coordination with geographic spacing between new interstitial channels and adjacent main channels would be used to ensure protection to operations on the main channels.

American Association of State Highway and Transportation Officials | American Radio Relay League | Association of Fish and Wildlife Agencies | Association of Public Safety Communications Officials | Forestry Conservation Communications Association | International Association of Chiefs of Police | International Association of Emergency Managers | International Association of Fire Chiefs | International Municipal Signal Association | National Association of State Chief Information Officers | National Association of State Emergency Medical Services Officials | National Association of State Foresters | National Association of State Technology Directors | National Council of Statewide Interoperability Coordinators | National Emergency Number Association | National Sheriffs' Association

NPSTC submitted comments to the Commission on May 11, 2015 noting that the foundation for successful implementation of the proposed interstitial channels is sufficient protection for operations on the current main channels in this spectrum, as well as sufficient protection between new interstitial channels. NPSTC also referenced the ongoing work of the LMCC to develop a protocol matrix that addresses protection between operations on the main and interstitial channels, and incorporates mechanisms for the variety of technologies used by the land mobile community.

In reply comments submitted on May 26, 2015, the LMCC provided its recommendations for successful implementation of new interstitial channels in the 809-817/854-862 MHz band segment. These recommendations include both guiding principles and a matrix specifying interference contours that can be used for all known combinations of adjacent channel system types. LMCC noted that the matrix, which would form the basis for frequency coordination, is subject to Commission oversight but should not be incorporated in the rules to facilitate modifications to accommodate future technologies.

NPSTC supports the LMCC recommendations. The matrix developed by the LMCC incorporates protection mechanisms to and from all known technologies operating in the 800 MHz band. NPSTC believes the LMCC recommendations will serve public safety and the overall land mobile community well to protect systems on existing channels and allow implementation of new interstitial channels that provide more spectrum opportunities.

While the vast majority of comments support introduction of interstitial channels in the 809-817/854-862 MHz band segment, NPSTC notes that a few commenters expressed opposition to the proposal. For example, one set of comments characterized the introduction of interstitials as “the cruel and unjust relinquishment by the incumbent 800 MHz licensees of a portion of their

existing operating assets, without any indicated possibility of compensation for their loss.”¹

However, given the multi-technology matrix approach to frequency coordination LMCC has since recommended in its reply comments, NPSTC believes incumbents would not relinquish any authorized spectrum assets. Under the LMCC approach, an incumbent would be protected based on its licensed parameters, which in essence defines its “existing operating asset” from a spectrum rights perspective.

In summary, NPSTC urges the Commission to move forward to implement interstitial channels in the 809-817/854-862 MHz band segment, in accordance with the LMCC frequency coordination recommendations and NPSTC’s previous recommendations regarding eligibility. Doing so will provide protection from interference, additional opportunities in some areas to implement systems meeting applicants’ operational requirements, and additional efficiency in use of this spectrum.

Ralph A. Haller, Chairman



National Public Safety Telecommunications Council
8191 Southpark Lane, Suite 205
Littleton, Colorado 80120-4641
866-807-4755

¹ Joint Comments of Peak Relay, Inc. and Palomar Communications, Inc., May 11, 2015 at page 4.