



**FirstNet  
Colorado**

**FirstNet Colorado Comments on  
FCC Public Notice Regarding  
FirstNet's Incumbent Relocation Proposal  
(DA 15-1253, released November 30, 2015)  
PS Docket No. 12-94  
VIA ECFS  
Submission Date: December 9, 2015**

The State of Colorado, Governor's Office of Information Technology, on behalf of the FirstNet Colorado Governing Body and staff appreciate the opportunity to comment on PS Docket No. 12-94, PS Docket No. 06-229, WT Docket No. 06-150 and DA 15-1253 regarding the First Responder Network Authority, or FirstNet's, Incumbent Relocation Proposal ex parte filing.

Colorado has four counties (or jurisdictions within those counties) impacted by the relocation requirements for this spectrum: Eagle County, El Paso County, Garfield County, and Pueblo County. One of the entities was recently advised by a representative of FirstNet, that FirstNet would be willing to accept the liability of having these frequencies programmed into users radios until the re-programming efforts were completed - even if that was after July 31, 2017.

Colorado has input with regard to the following statements:

FirstNet further requests "that the continuation of Commission licenses or other authorizations under Band 14 by any incumbent be conditioned upon the requirement that no operation on Band 14 be permitted without the express consent of FirstNet after July 31, 2017." FirstNet also requests that "[i]n addition or in the alternative, . . . the Commission consider conditioning any continued operation on Band 14 on the cessation of all operations on Band 14 within 90 days written notice to the Band 14 incumbent(s) from FirstNet that deployment of the NPSBN is to begin in its State."

Specifically, Colorado suggests that the Commission require FirstNet to clarify, in writing for the incumbents, and as soon as possible, these points as it relates to the





incumbent's continued operation of voice communications within this band beyond the July 31, 2017 deadline. This clarification would seek to avoid any confusion between FirstNet and the incumbents regarding the continued voice operation on the frequencies, the requirements to relocate and the ability to do so after July 31, 2017. Additionally, the Commission should require FirstNet should provide additional guidance on how they plan to work with the state and any incumbents who have failed to relocate once the 90 days written notice of the FirstNet deployment of the NPSBN in the state. The Commission should institute a waiver process or provide for extensions, as needed and justified, by which incumbents could seek to complete the relocation if extenuating circumstances impact their ability to meet the FirstNet timetable.

