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January 15, 1999

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Via Express Services Overnite

Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
1919 M St., Room 22
Washington, D.C. 20554

Re: Comments for Filing in Response to the FCC's Third Notice of Proposed Rulemaking, FCC 98-191, WT Docket No. 96-86.

To Whom It May Concern:

The National League of Cities and the City and County of San Francisco submit the enclosed comments for filing. This packet contains an original and five copies. Please file endorse one copy and return it in the enclosed self-addressed, stamped envelope.

If this packet does not contain all copies noted above, please contact me as soon as possible at (415) 554-4255. Thank you.

Very truly yours,

LOUISE H. RENNE
City Attorney

Christine Ferrari

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Enclosures

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
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The Development of Operational,	)	
Technical and Spectrum Requirements	)	
For Meeting Federal, State and Local	)	WT Docket No. 96-~~98~~ 96-86
Public Safety Agency Communication	)	
Requirements Through the Year 2010	)	
	)	
Establishment of Rules and Requirements	)	
For Priority Access Service	)	

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To: The Commission

COMMENTS OF THE NATIONAL LEAGUE OF CITIES AND THE CITY AND COUNTY OF SAN FRANCISCO IN RESPONSE TO THIRD NOTICE OF PROPOSED RULEMAKING

January 19, 1999

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TABLE OF CONTENTS

SUMMARY 1

COMMENTS. 4

I. THE COMMISSION MUST IMMEDIATELY RELEASE THE 8.8 MHz FOR GENERAL USE. 4

A. The Plain Language of the Balanced Budget Act Requires the Immediate Release of the Full 24 MHz. 5

B. Public Policy Dictates the Immediate Release of the 24 MHz. 7

II. THE 8.8 MHz OF REMAINING SPECTRUM SHOULD BE LICENSED BY A REGIONAL PLANNING COMMITTEE PROCESS. . . 10

A. The RPC Process Should Be Used. 10

1. The Composition of the RPC Should Be Modified. 12

2. The RPC Should Be Permitted to Disband Once the Commission Has Approved the Regional Plan. 12

3. The Frequency Coordinators Should Have Limited Authority. 13

4. An Appeals Board Should Be Established. 14

5. The Commission Should Establish A Funding Mechanism for the RPCs. 14

B. The "Reserve" Spectrum Should Not Be Licensed Directly to the States. 15

III. INTEROPERABILITY SPECTRUM SHOULD BE LICENSED DIRECTLY TO THE STATES. 16

IV. THERE IS A NEED FOR A NATIONWIDE INTEROPERABILITY BAND BELOW 512 MHz. 17

V. THE ISSUE OF POTENTIAL FOR INTERFERENCE TO GLOBAL ORBITING NAVIGATION SATELLITE SYSTEM (GLONASS) AND GLOBAL POSITIONING SYSTEM (GPS) SATELLITES SHOULD BE DEBATED. 17

VI. THE COMMISSION SHOULD SEEK DETAILED INFORMATION REGARDING PREPARATION OF COMPUTERS TO ACCOMMODATE YEAR 2000 DIRECTLY FROM LICENSEES AND SET STANDARDS FOR EQUIPMENT MANUFACTURERS. 18

CONCLUSION 19

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To: The Commission

COMMENTS OF THE NATIONAL LEAGUE OF CITIES
AND CITY AND COUNTY OF SAN FRANCISCO
IN RESPONSE TO
THIRD NOTICE OF PROPOSED RULEMAKING

SUMMARY

The National League of Cities ("NLC" and "League") and the City and County of San Francisco ("City" and "San Francisco") (collectively, "the Cities") submit these comments in response to the Federal Communication Commission's ("Commission's") Third Notice of Proposed Rulemaking ("Third Notice") in the above-captioned proceeding, FCC 98-191 (released September 29, 1998), 63 Fed. Reg. 58645 (November 2, 1998).

The NLC has an interest in the matters addressed by the Third Notice. The NLC is the largest and oldest organization representing the nation's cities and towns. The organization represents the elected municipal leaders of some 18,000 cities, towns, and other municipalities across the nation. In that capacity, the League holds public safety as

one of its highest priorities and has pressed for rapid implementation of the Public Safety Wireless Advisory Committee's recommendations. Experiences in cities across the country illustrate the value of seamless communications between public agencies within a city, between cities and surrounding counties, and with state and federal agencies, when any kind of tragedy occurs. The NLC strongly advocates action to prevent any situation which could delay or interfere with the ability of the men and women who daily put their lives on the line to protect the lives of the citizens the NLC represents. Consequently, the NLC has an interest in this proceeding because of its potential to critically impact cities' ability to plan for the future.

San Francisco and its public safety agencies, including the Police Department, Fire Department, Emergency Medical Services, and the Airport Bureau at the San Francisco International Airport, have an interest in the matters addressed by the Third Notice. The City's public safety agencies, whose principal purpose is to protect the safety of life, health, and property, will be the ultimate recipients of the newly-reallocated spectrum. Because the citizens of San Francisco are the ultimate beneficiaries of improved public safety services, the City also has an interest in the outcome of this proceeding.

The Third Notice proposes terms and conditions to govern the use of the 24 megahertz ("MHz") of spectrum recently reallocated from broadcast to public safety services. The allocation, the largest ever made for public safety communications, will provide significant benefits to the public. The Cities commend the Commission for responding to the needs of the public safety community and local citizens. However, the

Cities have concerns regarding certain aspects of the Third Notice and hereby submit these comments to the Commission for consideration.

In sum, the Cities urge the Commission to immediately release all of the 24 MHz of spectrum reallocated for public safety services, including the 8.8 MHz that the Commission has designated as "reserve" spectrum. Congress has expressly directed the Commission to allocate and assign licenses for 24 MHz of spectrum for public safety services by September 30, 1998, and there is an immediate need in the public safety community for additional spectrum. The Cities submit that release of the entire block of spectrum will provide greater flexibility in addressing the issue of potential interference to Global Orbiting Navigation Satellite System and Global Positioning System satellites from public safety systems operating in the 794-806 MHz band.

The Cities also recommend that the Commission license the "reserve" spectrum by the regional planning process, and not by licensing that spectrum directly to the states. The regional planning process can achieve greater efficiency and effectiveness in the licensing of public safety spectrum than a state-level licensing scheme. However, the Cities suggest that the Commission make minor modifications to the regional planning process, including establishing an appeals board to counterbalance subjective factors in the licensing of spectrum, and establishing a funding mechanism to ensure the success of the regional planning approach.

The Cities support the Commission's proposal to establish a National Coordinating Committee to develop operational and technical recommendations for nationwide interoperability. Due to the success of state-level implementation of

interoperability efforts, the Cities also recommend that the 2.6 MHz designated for nationwide interoperability be licensed directly to the states.

The Cities support the Commission's proposal to designate additional interoperability channels below 512 MHz and submit that interoperability channels are still necessary in this range. Finally, the Cities recommend that the Commission contact licensees directly to obtain detailed information regarding Year 2000 compliance initiatives and set standards for public safety equipment manufacturers that assert claims of "Year 2000 compliance".

COMMENTS

I. THE COMMISSION MUST IMMEDIATELY RELEASE THE 8.8 MHz FOR GENERAL USE.

Of the 24 MHz of newly-reallocated spectrum, the Commission designated 12.6 MHz of spectrum for general local, regional or state use and proposes a band plan for this block of spectrum. First Report and Order ("First Report"), FCC 98-191 (released September 29, 1998), 63 Fed. Reg. 58645 (November 2, 1998), at ¶ 43. The Commission also designated 8.8 MHz as "reserve" spectrum, pending the Commission's adoption of the licensing proposals made in the Third Notice. First Report at ¶ 43. The Commission now seeks comment on whether it should hold the 8.8 MHz in reserve for future use. Third Notice at ¶ 169. The Commission also seeks comment on how the Commission should license this 8.8 MHz of spectrum. Id. The Cities recommend that this 8.8 MHz of spectrum be immediately released, rather than held in reserve, and that the entire block of spectrum be designated for general use and be subject to a single licensing scheme.

The Cities urge the Commission to release the 8.8 MHz to the regional planning committees for general use. The Cities recognize the value of reserving spectrum for

future use to ensure that local governments and public safety agencies have sufficient spectrum to implement advanced communications systems when funding to build those systems is finally secured. However, the plain language of the Balanced Budget Act requires the Commission to allocate the full 24 MHz of that spectrum, and to begin licensing this 24 MHz no later than September 30, 1998. Further, the Cities believe that there is currently an immediate need for this entire spectrum, including the 8.8 MHz block. Public safety agencies with available funding should be afforded the capability to deploy advanced services. The immediate release of this 8.8 MHz of spectrum will also permit a more equitable distribution of channels to public safety agencies and encourage the development of advanced public safety systems.

A. The Plain Language of the Balanced Budget Act Requires the Immediate Release of the Full 24 MHz.

In 1996, the Public Safety Wireless Advisory Committee ("PSWAC") recognized that public safety radio frequencies had become highly congested in most of the nation, especially urban areas. Final Report of the Public Safety Wireless Advisory Committee to the Federal Communications Commission, September 11, 1996, at 2 ("PSWAC Report"). PSWAC concluded that 25 MHz of spectrum must be *immediately allocated* to public safety to meet critical voice and data needs that were unmet by the then-available spectrum and to promote the development of advanced equipment for new public safety services. PSWAC Report at 3. PSWAC also concluded that an additional 70 MHz may be needed for public safety applications by the year 2010. Id. PSWAC warned that "*unless immediate measures are taken to alleviate spectrum shortfalls and promote interoperability, public safety agencies will not be able to adequately discharge their*

obligation to protect life and property in a safe, efficient and cost effective manner." Id. (emphasis in original).

Responding to the warnings by PSWAC, Congress expressly directed the Commission to allocate and assign licenses for 24 MHz of spectrum for public safety services no later than September 30, 1998. Despite Congress' express and unequivocal directive, the Commission suggests that it may segregate and hold the 8.8 MHz in reserve for future use.

The plain language of the Balanced Budget Act contradicts the Commission's suggestion that it may hold a portion of the 24 MHz in reserve for future use. Section 337 expressly requires the Commission to allocate "24 MHz of [the 746-806 MHz] spectrum for public safety services" no later than January 1, 1998. Balanced Budget Act of 1997, Pub. L. No. 105-33, § 3004, 111 Stat. 251 (1997), codified at 47 U.S.C. § 337(a). Section 337 also expressly requires the Commission to "commence assignment of the licenses for public safety services [] no later than September 30, 1998." 47 U.S.C. § 337(b). By expressly requiring that the Commission begin assigning licenses for the allocated 24 MHz of spectrum no later than September 30, 1998, Congress clearly intended that *all 24 MHz* of newly allocated public safety spectrum be made *immediately* available for use. "If the intent of Congress is clear, that is the end of the matter." Chevron U.S.A., Inc. v. Natural Resources Defense Council, Inc., 467 U.S. 837, 842 (1984).

Contrary to the Commission's suggestion, nothing in Section 337 authorizes the Commission to segregate and reserve any of this spectrum for future use. Had Congress intended to grant the Commission the power to segregate portions of the 24 MHz, and

reserve them for future use, Congress clearly would have made its intention known. However, Congress did not. The Commission's suggestion to reserve 8.8 MHz conflicts with the plain language of Section 337, and thus exceeds the scope of its authority.

B. Public Policy Dictates the Immediate Release of the Full 24 MHz.

Not only does the plain language of the statute, but policy concerns also contradict the Commission's suggestion that it may reserve portions of this 24 MHz of spectrum for future use. There is currently an immediate need for additional spectrum. Thus, the Cities urge the Commission to release the entire block, rather than hold any in reserve.

San Francisco, as many other cities, immediately needs to replace and significantly upgrade its public safety systems. Several of these upgrades involve wireless data systems -- now considered absolutely necessary for police and fire public safety purposes. For example, the San Francisco Police Department and the Fire Department, including Emergency Medical Services, are involved in the development and implementation of a citywide Enhanced 911 Project ("E-911 Project"). The E-911 Project will result in the implementation of a Combined Emergency Communication Center ("CECC"); an integrated Computer Aided Dispatch ("CAD") and Automatic Information System ("AIS"); a citywide 800 MHz Simulcast Trunked Radio System; and a Wireless Data Network ("WDN"). The CECC will become the City's new primary Public Safety Answering Point ("PSAP") where enhanced 911 calls will be answered.

With the aid of the CAD, appropriate public safety officers will be dispatched on the 800 MHz Simulcast Trunked Radio System. Public safety officers in the field will use the AIS to access and obtain vital information from county, state, and federal

databases, via wireless computer terminals. The WDN will permit mobile public safety officers to access and obtain information including finger and palm prints, mugshots, geographical maps, and blueprints from county, state, and federal databases on a day-to-day basis. The E-911 system will also permit public safety officers to transmit field reports from the mobile computing terminals. This will eliminate the need for field units to file and submit incident reports in person at their respective offices, resulting in a significant savings of public safety resources.

The Airport Bureau at San Francisco International Airport is implementing a similar CAD and WDN system to provide public safety officers at the airport with similar capabilities. The Airport's CAD system is also scheduled to be operational in 1999.

The information in the City's CAD/AIS databases is readily available to wired terminals. However, front-line public safety officers can only realize the value of the information contained in these databases if they can access and receive that information efficiently from wireless mobile computing terminals in the field. For example, airport firefighters can best decide how to handle a working fire if they can quickly obtain an up-to-date map showing the location of hazardous or volatile materials at the site; police officers may take appropriate measures with a stopped suspect if they can immediately match the suspect to mugshots or fingerprints contained in the databases; and paramedics can provide better care to a victim at the site of an accident if they are able to access critical medical records in time to make appropriate medical decisions.

The Commission proposes to immediately release 12.6 MHz of spectrum in the 700 MHz band. While the 12.6 MHz will permit public safety agencies to begin migrating, upgrading, and expanding their current wireless data operations, high-speed

data and video transmission may not be effectively utilized unless additional spectrum is released. The proposed channel splits for wideband use limit the number of available channels that can be utilized within a region, limiting the ability of local governments to benefit from advanced public safety technologies. Local governments and public safety agencies will greatly benefit if the 8.8 MHz that the Commission proposes to hold in reserve is immediately released. Release of the 8.8 MHz will double the number of channels available for immediate use.

The Cities commend the Commission for recognizing and adopting wideband radio channels and the building block approach to channelization for the 700 MHz band. However, the Cities' public safety agencies will not be able to realize the full potential of their public safety systems if restricted to use of current channels in the 800 MHz band. The 800 MHz public safety channels are restricted to 12.5 kilohertz use and cannot accommodate the data speed necessary to transmit and receive time-valued information to field officers, even with the best technology that the radio communications industry can now offer.

The San Francisco Bay Area encompasses nine counties and more than seventy cities. High percentage radio coverage design, traffic loading, and channel loading will require more than a single wideband channel for San Francisco. Similar conditions exist in neighboring areas, and in other regions of the country. The number of wideband channels available in the channel plan results in a shortfall for all San Francisco Bay Area local governments. Immediate release of the 8.8 MHz spectrum will help alleviate the potential shortage of wideband channels in the San Francisco Bay Area, as well as other communities across the country. With sufficient spectrum and prudent planning, local

governments can build more efficient and effective public safety wireless information systems.

II. THE 8.8 MHz OF REMAINING SPECTRUM SHOULD BE LICENSED BY A REGIONAL PLANNING COMMITTEE PROCESS.

The Commission seeks proposals for the use and licensing of the "reserve" 8.8 MHz of spectrum. Third Notice at ¶ 168. Specifically, the Commission requests comment on whether some or all of this spectrum should be licensed pursuant to the regional planning committee ("RPC") process or directly to each state. Third Notice at ¶ 173. The Cities support using the RPC process to license the 8.8 MHz of spectrum. The Cities recognize the success of the regional planning approach used for the 800 MHz band and agree with the Commission's decision to use the regional planning process to license the 12.6 MHz general use spectrum. The Cities recommend that all of the 8.8 MHz designated as "reserve" spectrum also be licensed by means of a regional planning process. However, the Cities propose certain modifications of the RPC process.

A. The RPC Process Should Be Used.

The Cities support using the RPC process for licensing and administering the "reserve" 8.8 MHz of spectrum for two reasons. First, the Commission has already concluded that the regional planning approach is appropriate for the assignment of the 12.6 MHz general use spectrum. First Report at ¶ 77-78. Creating a new state structure to license the remaining 8.8 MHz of spectrum would be both inefficient and confusing. A new state structure that would license the remaining 8.8 MHz would merely duplicate the function of the existing RPCs, forming yet another government body to perform the same function. Further, local governments would face immediate confusion about which

body would assign which frequencies, and which body would be the appropriate one with which to file applications.

Second, an RPC, and not the state, can best determine the needs of local governments in each region and can plan accordingly. Representatives from local governments possess information essential to the effective and efficient design of public safety systems. For example, representatives from local governments are most familiar with the geographic profiles of their communities, the demographic shifts that may indicate a high or low demand for public safety services, local ordinances that may restrict construction of radio systems, the condition of current local public safety radio communication systems, the availability and potential sources of funds, and the pulse of local politics. Using the foregoing information, an RPC can best determine the radio system design that will serve the needs of its community.

However, San Francisco's experience in the National Public Safety Advisory Committee 800 MHz band regional planning process indicates that the process can be improved upon. While the regional planning process is capable of success, the process permits subjective evaluations of license applications. To increase the fairness and effectiveness of the RPC process for the planning, licensing, and administering of the 700 MHz public safety spectrum, the Cities make the following suggestions regarding the composition of the RPC, the long-term role of the RPC, the role of the frequency coordinators, and the establishment of an appeals process and funding mechanism for the RPCs.

1. The Composition of the RPC Should Be Modified.

The Cities propose that the composition of the RPC used for the 800 MHz band, be modified for the 700 MHz band. The RPC should be composed solely of members currently employed by local governments in each respective region, including personnel from city and/or county police, fire, emergency medical services, telecommunications planners, information systems specialists, end users, and others who can contribute and dedicate their efforts to the planning process. Members of the RPC need not be technical experts. Those who participate in the regional planning process can consult with technical experts and in fact often have such experts available to them in their organizations.

Members or affiliates of the recognized frequency coordinating bodies should not also serve on the RPCs. Maintaining an independent membership will de-centralize control over the planning and licensing of spectrum and eliminate any perceived conflict of interest that may have affected the 800 MHz regional planning process.

Additionally, the Cities recommend that members of the RPC hold no interest in any commercial venture that stands to profit from the regional plan. This should further ensure that the RPC process is unbiased.

2. The RPC Should Be Permitted to Disband Once the Commission Has Approved the Regional Plan.

In the First Report, the Commission requires the RPCs to set forth evidence of successful coordination with adjacent regions and a description of planning procedures, including an amendment process. First Report at ¶ 84. The Cities make the following recommendations regarding the review and modification of regional plans.

The Cities suggest that the RPC be permitted to disband once the Commission has approved the regional plan. The RPC chairperson and a sufficient number of executive staff should be retained to administer the plan, represent the region before the Commission, initiate revisions, receive, review, and approve license applications, and, if necessary, recall the full board. The remaining committee would also be responsible for keeping the region up-to-date on any changes to the plan.

Once an application for a license is approved by the RPC chairperson, indicating that the licensee has met the criteria set forth in the plan, the license should be sent to any of the recognized frequency coordinators. The regional plan should specify that frequency coordination activity will be distributed equitably among the various coordinators.

The RPC should be allowed to administer the regional plan as innovatively as technology will allow. For example, the RPC might use an Internet website to distribute information including a database of licensed users, pending applications, radio coverage profiles of licensed users, and notices from the Commission that affect the regional plan. Management of the spectrum will improve if this information is readily available to those within a region as well as the neighboring regions.

3. The Frequency Coordinators Should Have Limited Authority.

Currently, frequency coordinators have the power to recommend changes to regional plans. The Commission has proposed to limit this power, requiring that the RPC chairperson initiate any plan modification. First Report ¶ 88. The Cities agree with the Commission's proposed limitation on the power of the frequency coordinators and make the following additional proposals.

The Cities suggest that the recognized frequency coordinator serve in a ministerial, rather than discretionary, capacity. The frequency coordinator should review Commission applications for accuracy, ensure that there is no interference in the assignment of frequencies, and file applications with the Commission. The frequency coordinator should also maintain a database of assigned and available channels. Conflicts of interest in licensing radio channels may be eliminated if the roles of the frequency coordinators and the RPCs are clearly delineated.

4. An Appeals Board Should Be Established.

The Cities recognize that situations may arise in which eligible applicants may still be unreasonably denied licenses. In the event that the retained RPC members deny an application, an applicant should have recourse to an appeals process. The Cities propose that the Commission establish an appeals process to ensure the objectivity of the licensing of spectrum.

The Cities propose that an applicant have recourse to two levels of appeal. Upon initial denial of an application, an applicant could appeal to a board composed of chairpersons and staff from the next two nearest RPCs. If that board denied the application, the applicant could appeal directly to the National Coordinating Committee or the Commission. Two levels of appeal should provide some assurance that subjective factors that commonly affect organizational structures will not prevent the effective and efficient allocation of public safety spectrum.

5. The Commission Should Establish A Funding Mechanism for the RPCs.

Most of the problems with the RPC process can be traced to one source: the lack of independent funding for the RPCs. The Commission has imposed a series of

obligations on RPCs. First Report at ¶ 84. Yet the Commission has failed to ensure the RPCs have adequate funding to fulfill their obligations. Without funding, the RPCs have had to depend on interested organizations and interested individuals to provide resources. Further, smaller and more rural local governments have not been able to participate fully in the regional planning process. The Cities urge the Commission to provide federal funding to ensure the success of the regional planning approach to licensing the 24 MHz of spectrum.

B. The "Reserve" Spectrum Should Not Be Licensed Directly to the States.

The Commission seeks comment on whether the 8.8 MHz of "reserve" spectrum should be released directly each state for deployment of statewide systems. Third Notice at ¶ 178. The Cities oppose licensing the reserve spectrum directly to the state. A statewide radio communication system would not effectively and efficiently support public safety services.

For example, in California, a statewide radio communication system would necessarily be enormous and complex. A statewide system would require centralized control and management that would likely be unresponsive to the variable rates of growth and special needs of individual communities.

A statewide system would also lock local governments into platforms and technologies chosen by the state. Rather than promoting competition among equipment manufacturers, a statewide system would guarantee the successful bidder a statewide market for the life cycle of the equipment. While there would be competition in the initial bidding process, long-term competition would suffer. Additionally, localities might not be able to take advantage of emerging technologies or cost-effective,

appropriately sized systems designed to meet local needs. Under a state-licensed system, local governments would lose their ability to determine the quality or level of service that will be available in their areas.

The Cities anticipate that if the Commission were to license the spectrum directly to the state, the design and implementation of public safety systems would be further hampered by additional hurdles. Therefore, the Cities do not believe that a statewide radio communications system would be in the public interest.

III. INTEROPERABILITY SPECTRUM SHOULD BE LICENSED DIRECTLY TO THE STATES.

The Commission has designated 2.6 MHz of the public safety spectrum in the 700 MHz band for nationwide interoperability. First Report at ¶ 2. The Commission also proposes establishing a National Coordinating Committee ("NCC") to develop operational and technical recommendations regarding nationwide interoperability. First Report at ¶ 92. The Commission seeks comment on whether the designated interoperability channels are appropriate for direct state licensing. Third Notice at ¶ 182. The Commission also seeks comment on whether the regional planning approach should be used to license the 2.6 MHz of interoperability spectrum, and if so, whether that approach should be modified or refined for this spectrum. Third Notice at ¶ 182.

The Cities support the establishment of the NCC. The Cities also support a statewide system for planning and licensing the spectrum designated for interoperability. Historically, states have done a fair job of constructing statewide interoperability systems. For example, in California, the Governor's Office of Emergency Services provides guidelines for the licensing, building, and operation of mutual aid radio systems, including guidelines for the operation of monitoring control points. Many states,

including California, have statewide telecommunications networks that can be used to link and integrate mutual aid radio systems. The states possess the experience and expertise necessary to license interoperable radio systems. Therefore, the Cities recommend that this interoperability spectrum be licensed directly to the state.

IV. THERE IS A NEED FOR A NATIONWIDE INTEROPERABILITY BAND BELOW 512 MHz.

The Commission seeks comment on the necessity of establishing a nationwide interoperability band below 512 MHz. Third Notice at ¶ 193. The Cities support the establishment of additional interoperability channels below 512 MHz, as these channels are needed for mutual aid radio systems. Although many local governments and public safety agencies have begun building communications systems in the 800 MHz band, and will design and build systems for use in the 700 MHz band, some public safety agencies are still operating in the 512 MHz band. In order to maintain regional and interregional interoperability, channels below 512 MHz must still be utilized.

The Cities agree with other commenters that the VHF range, 138-144 MHz and 156-162 MHz, are preferable for long distance wide area radio communication systems. See Third Notice at ¶ 189. Because fewer high-power repeater stations are required, channels in these frequencies are more cost-effective than those in either the 800 MHz or 700 MHz bands.

V. THE ISSUE OF POTENTIAL FOR INTERFERENCE TO GLOBAL ORBITING NAVIGATION SATELLITE SYSTEM (GLONASS) AND GLOBAL POSITIONING SYSTEM (GPS) SATELLITES SHOULD BE DEBATED.

The Cities share the Commission's concerns regarding the potential for interference to GLONASS and GPS satellites from public safety systems operating in the

794-806 MHz band. See Third Notice at ¶ 196. The Cities support Motorola's proposal that this issue be debated. See Third Notice at ¶ 201. The Cities also submit that release of the 8.8 MHz designated as "reserve" will provide more channels and greater flexibility in addressing interference issues raised by use of channels in the 700 MHz band.

VI. THE COMMISSION SHOULD SEEK DETAILED INFORMATION REGARDING PREPARATION OF COMPUTERS TO ACCOMMODATE YEAR 2000 DIRECTLY FROM LICENSEES AND SET STANDARDS FOR EQUIPMENT MANUFACTURERS.

The Commission seeks comment on how best to ascertain the extent, reach, and effectiveness of the Year 2000 compliance initiatives that have been or are being undertaken by public safety entities. As in many other cities, San Francisco's departments are currently engaged in efforts to seek Year 2000 compliance from vendors. The Cities recommend that the Commission obtain detailed information on Year 2000 compliance efforts directly from individual licensees. The Cities also suggest that the Commission assist licensees by requiring equipment manufacturers to provide more comprehensive information regarding their efforts to resolve potential Year 2000 problems with their products. The Commission should formulate criteria for testing procedures and set standards for defining "Year 2000 compliance" as it relates to telecommunications technologies. This will assist local governments and licensees in obtaining uniform results from their Year 2000 compliance initiatives.

CONCLUSION

The NLC and San Francisco submit the foregoing comments for the Commission's consideration.

Respectfully submitted by:

Christine Ferrari

Christine Ferrari
Deputy City Attorney

January 19, 1999

The following city employees contributed to the preparation of these comments:

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Mike Gaynor, Crime Scene Investigator, San Francisco Police Department. MA, Administration of Justice. Mr. Gaynor administrates Automated Fingerprint Identification System ("AFIS") and digital mugshot systems. He is a boardmember of the NEC AFIS users group, an International body of all NEC AFIS system users. He is an expert in fingerprinting and AFIS technology and is currently designing a new AIS system for the City.

Joanne Hayes-White, Assistant Deputy Chief, Division of Support Services, San Francisco Fire Department. Ms. Hayes-White is Department Liaison for the E-911 Project. She is a Certified Fire Officer, State Fire Marshall. Ms. Hayes-White is a member of the Fire Chiefs Association and the National Fire Information Council.

Scott Hidy, Communications Supervisor, Communications Center, San Francisco International Airport. Mr. Hidy coordinates police, fire, and airfield safety emergency communications systems at the Airport.

Jerry White, Senior Radio Technician, Department of Telecommunications and Information Services. Ms. White supervises field service repair.