

REGION-20 821 MHZ PUBLIC SAFETY LEGISLATIVE/REGULATORY AFFAIRS

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WIRELESS TELECOMMUNICATIONS BUREAU
PRIVATE WIRELESS DIVISION
WASHINGTON, D.C. 20554**

In the Matter of)
)
Washington, DC Metropolitan Area) GN Docket No. 90-7
Regional Public Safety Plan)
(Region-20))

**SECOND ADDENDUM TO THE PETITION TO AMEND
THE REGION-20 821 MHZ PUBLIC SAFETY PLAN**

Submitted by:

Region-20 821 MHz Public Safety Regional Plan Review Committee
Legislative/Regulatory Affairs
Dr. Michael C. Trahos, D.O., NCE, CET - Chairman
4600 King Street, Suite 6K
Alexandria, Virginia 22302-1249

September 2, 1999

REGION-20 821 MHZ PUBLIC SAFETY LEGISLATIVE/REGULATORY AFFAIRS

**Before the
Federal Communications Commission
Washington, DC 20554**

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Dr. Michael C. Trahos, D.O., NCE, CET - Chairman
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Date: September 2, 1999

I. INTRODUCTION

1. Before the Federal Communications Commission (Commission) is a **Second Addendum (SECOND ADDENDUM) to the Petition to Amend¹ (AMENDMENT PETITION) the Region-20 821 MHz Public Safety Plan.**

¹ See also **PUBLIC NOTICE**, DA 96-158, February 12, 1996.

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2. Pursuant to the authority given by the Commission under the *NPSPAC Report and Order*,² the Region-20 821 MHz Public Safety Planning Committee was created to address the future communications needs and concerns of the PSRS users for Region-20. The obligations of that Committee included the submission to the Commission of a Region-20 821 MHz Public Safety Radio Communications Plan (Region-20 821 MHz Plan)³ and establishment of a Region-20 821 MHz Public Safety Regional Plan Review Committee (Committee or Region-20 or RPRC) to oversee its implementation.

3. This Committee, representing the PSRS/governmental constituents for Region-20, hereby submits the following **SECOND ADDENDUM** to the **AMENDMENT PETITION** to the Region-20 821 MHz Plan in compliance with General Docket Nos. 87-112 and 90-7.

² **REPORT AND ORDER**, General Docket No. 87-112, FCC 87-359, November 24, 1987, 3 FCC Rcd, at 905, Paragraph 4 (*NPSPAC Report and Order*).

³ **WASHINGTON, DC METROPOLITAN AREA - REGION-20**, General Docket No. 90-7, DA 90-28, 5 FCC Rcd 1984, January 17, 1990.

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II. SECOND ADDENDUM

4. On March 26, 1990, the Commission adopted the Region-20 821 MHz Public Safety Plan (Region-20 821 MHz Plan 1990 Version).⁴ An amendment to the Region-20 821 MHz Plan 1990 Version, to incorporate changes to the frequency matrix as a result of the first filing window, as approved by the Commission on February 10, 1994 (Region-20 821 MHz Plan 1994 Version).⁵ An **AMENDMENT PETITION** to the Region-20 821 MHz Plan 1994 Version, to incorporate changes to the frequency matrix as a result of the second filing window, was submitted to the Commission on November 25, 1994. An (*first*) addendum to the **AMENDMENT PETITION** was filed on January 26, 1996 (Region-20 821 MHz Plan 1996 Version). On December 9, 1996, the Commission Aconditionally accepted≡ the Region-20 821 MHz Plan 1996 Version.⁶

5. The Commission has not given final Aunconditional adoption≡ to the Region-20 821 MHz Plan 1996 Version due to objections to the revised frequency matrix contained therein. After extensive negotiations with the Regions 28 and 36 Planning Committees,

⁴ **Ibid.**

⁵ **ORDER**, General Docket No. 90-7, 9 FCC Rcd 703 (1994).

⁶ **ORDER**, General Docket Nos. 90-7 & 89-573, DA 96-2066, December 9, 1996.

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a resolution to the perceived *inter*-regional frequency conflicts has been achieved.⁷ Appendix to this **SECOND ADDENDUM** (Attachment A) is the *inter*-regionally agreed to revised frequency matrix changes to the Region-20 821 MHz Plan 1996 Version.

III. CONCLUSION

6. Pursuant to the authority under General Docket Nos. 87-112 & 90-7, this Committee hereby submits this **SECOND ADDENDUM** (hereinafter referred to as the Region-20 821 MHz Plan 1999 Version) to the **AMENDMENT PETITION** for Commission consideration and approval.

7. Commission adoption of the **AMENDMENT PETITION** and this **SECOND ADDENDUM** is appreciated by this Committee and Region-20, and is in the **public interest**.

Respectfully submitted,

/s/ **Michael C. Trahos, D.O., NCE, CET**

Dr. Michael C. Trahos, D.O., NCE, CET
Chairman - Legislative/Regulatory Affairs
Region-20 821 MHz Public Safety RPRC

MCT/mct
Attachment A - Revised Frequency Matrix
Attachment B - Intra-Region-20 Concurrence Letters

⁷ **WRITTEN EX PARTE PRESENTATION - RESPONSE STATEMENT**, General Docket Nos. 90-7 & 89-573, September 2, 1999.

ATTACHMENT A

**REGION-20 821 MHZ PUBLIC SAFETY
COMMUNICATIONS PLAN FREQUENCY MATRIX**

Pursuant to the **INTER-REGIONAL CHANNEL RE-ASSIGNMENT AGREEMENT** of July 22, 1999, Appendix I of the Region-20 821 MHz Plan 1996 Version is amended as follows:

Channel #	Add/Remove	Assigned Agency
612	Add	Carroll County
621	Add	Montgomery Co., MD
624	Remove	State of MD B N. East
624	Add	State of MD B N. West
658	Remove	Anne Arundel County
690	Remove	Carroll County
693	Remove	Carroll County
702	Add	Carroll County
704	Remove	State of MD B N. West
704	Add	State of MD B N. East
706	Remove	Carroll County
750	Add	Anne Arundel County
766	Remove	Montgomery Co., MD
778	Add	Carroll County

ATTACHMENT B

REGION-20 821 MHZ PUBLIC SAFETY LEGISLATIVE/REGULATORY AFFAIRS

**Public Safety Radio Communications Plan
Region 20 *
Maryland, Washington D.C. and Northern Virginia**

Mailing Address:

Howard S. Redman, Jr. (RPRC Secretary)
Carroll County (MD) Emergency Manager
1345 Washington Road
Westminster, MD 21157
VOICE: 410-848-1488
FAX: 410-848-3794

RPRC Chairman:

Steve Souder
Administrator
Arlington County, Virginia
Emergency Communications Center
1400 North Uhle Street
5th Floor
Arlington, VA 22201-9998
VOICE: 703-358-4080
FAX: 703-358-3989

June 25, 1999

To: Mr. William Taylor, Chief
Anne Arundel Co. Telecommunications

Fm: Region 20 RPRC /s/ W. Van Aller

Re: Region 20 Application Window 3 Facilitation

The Federal Communications Commission has effectively caused an extensive delay (since 1996) in the Region 20 and Region 28 channel allocation processes by requiring us to solve some potentially severe interregional interference problems (with the State of Pennsylvania) before allowing the regional frequency allocation process to move forward.

In order to address this problem, Region 20, Region 28, and Region 36 have been working together to generate modifications to our joint frequency table that will eliminate those potential interference problems. The impact of the proposed table modifications is minimal on Region 20; only (7) existing channel assignments are affected, (3) of which involve the primary problem area, Carroll Co. MD. (See attached table changes listing.) The only constructed system affected by these proposed changes appears to be Carroll Co.; the others are not yet built.

APCO-AFC has promised to process the frequency changes (only) as shown in the attached table on your existing licenses at no cost to the licensee. (Updated FCC form 600's should be prepared in the conventional manner.) Region 20 respectfully requests your cooperation in this project, as the process delays being experienced at the present time are causing severe problems with

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upgrading of communications to 821MHz in several jurisdictions.

In order to ease the burden of your response, please sign below with your concurrence and return to the writer (W. Van Aller, Telecommunications, 100 Maryland Ave., Rockville, MD 20850) at your earliest convenience:

For Anne Arundel Co.: /s/ William W. Taylor, Jr. Date 8/16/99

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REGION-20 821 MHZ PUBLIC SAFETY LEGISLATIVE/REGULATORY AFFAIRS

**Public Safety Radio Communications Plan
Region 20 *
Maryland, Washington D.C. and Northern Virginia**

Mailing Address:

Howard S. Redman, Jr. (RPRC Secretary)
Carroll County (MD) Emergency Manager
1345 Washington Road
Westminster, MD 21157
VOICE: 410-848-1488
FAX: 410-848-3794

RPRC Chairman:

Steve Souder
Administrator
Arlington County, Virginia
Emergency Communications Center
1400 North Uhle Street
5th Floor
Arlington, VA 22201-9998
VOICE: 703-358-4080
FAX: 703-358-3989

June 25, 1999

To: Mr. Buddy Redman, Chief
Carroll County Emergency Comms.

Fm: Region 20 RPRC /s/ W. Van Aller

Re: Region 20 Application Window 3 Facilitation

The Federal Communications Commission has effectively caused an extensive delay (since 1996) in the Region 20 and Region 28 channel allocation processes by requiring us to solve some potentially severe interregional interference problems (with the State of Pennsylvania) before allowing the regional frequency allocation process to move forward.

In order to address this problem, Region 20, Region 28, and Region 36 have been working together to generate modifications to our joint frequency table that will eliminate those potential interference problems. The impact of the proposed table modifications is minimal on Region 20; only (7) existing channel assignments are affected, (3) of which involve the primary problem area, Carroll Co. MD. (See attached table changes listing.) The only constructed system affected by these proposed changes appears to be Carroll Co.; the others are not yet built.

APCO-AFC has promised to process the frequency changes (only) as shown in the attached table on your existing licenses at no cost to the licensee. (Updated FCC form 600's should be prepared in the conventional manner.) Region 20 respectfully requests your cooperation in this project, as the process delays being experienced at the present time are causing severe problems with

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Maryland, Washington D.C. and Northern Virginia**

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Carroll County (MD) Emergency Manager
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FAX: 410-848-3794

RPRC Chairman:

Steve Souder
Administrator
Arlington County, Virginia
Emergency Communications Center
1400 North Uhle Street
5th Floor
Arlington, VA 22201-9998
VOICE: 703-358-4080
FAX: 703-358-3989

June 25, 1999

To: Mr. Dennis Rooney, Chief
Telecommunications Div. - Montgomery Co.

Fm: Region 20 RPRC /s/ *W. Van Aller*

Re: Region 20 Application Window 3 Facilitation

The Federal Communications Commission has effectively caused an extensive delay (since 1996) in the Region 20 and Region 28 channel allocation processes by requiring us to solve some potentially severe interregional interference problems (with the State of Pennsylvania) before allowing the regional frequency allocation process to move forward.

In order to address this problem, Region 20, Region 28, and Region 36 have been working together to generate modifications to our joint frequency table that will eliminate those potential interference problems. The impact of the proposed table modifications is minimal on Region 20; only (7) existing channel assignments are affected, (3) of which involve the primary problem area, Carroll Co. MD. (See attached table changes listing.) The only constructed system affected by these proposed changes appears to be Carroll Co.; the others are not yet built.

APCO-AFC has promised to process the frequency changes (only) as shown in the attached table on your existing licenses at no cost to the licensee. (Updated FCC form 600's should be prepared in the conventional manner.) Region 20 respectfully requests your cooperation in this project, as

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the process delays being experienced at the present time are causing severe problems with upgrading of communications to 821MHz in several jurisdictions.

In order to ease the burden of your response, please sign below with your concurrence and return to the writer (W. Van Aller, Telecommunications, 100 Maryland Ave., Rockville, MD 20850) at your earliest convenience:

For Montgomery County.: /s/ *Dennis M. Rooney* Date 8/13/99

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REGION-20 821 MHZ PUBLIC SAFETY LEGISLATIVE/REGULATORY AFFAIRS

**Public Safety Radio Communications Plan
Region 20 *
Maryland, Washington D.C. and Northern Virginia**

Mailing Address:

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Carroll County (MD) Emergency Manager
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FAX: 703-358-3989

June 25, 1999

To: Mr. G. Edward Ryan, II, Asst. Dir.
Wireless Communications - State of MD OIT

Fm: Region 20 RPRC /s/ W. Van Aller

Re: Region 20 Application Window 3 Facilitation

The Federal Communications Commission has effectively caused an extensive delay (since 1996) in the Region 20 and Region 28 channel allocation processes by requiring us to solve some potentially severe interregional interference problems (with the State of Pennsylvania) before allowing the regional frequency allocation process to move forward.

In order to address this problem, Region 20, Region 28, and Region 36 have been working together to generate modifications to our joint frequency table that will eliminate those potential interference problems. The impact of the proposed table modifications is minimal on Region 20; only (7) existing channel assignments are affected, (3) of which involve the primary problem area, Carroll Co. MD. (See attached table changes listing.) The only constructed system affected by these proposed changes appears to be Carroll Co.; the others are not yet built.

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