

REGION-20 821 MHZ PUBLIC SAFETY REGIONAL PLAN REVIEW COMMITTEE

**Public Safety Radio Communications Plan
Region-20 821 MHz *
Maryland, Washington D.C. and Northern Virginia**

RPRC CHAIRMAN:

Mr. Stephen H. Souder - Administrator
Arlington County (VA) Public Safety Emergency Communications Center
1400 North Uhle Street, 5th Floor
Arlington, VA 22201-9998
Phone: 703-228-4080
Fax: 703-228-3989

LEGISLATIVE/REGULATORY AFFAIRS CHAIRMAN:

Dr. Michael C. Trahos, D.O., NCE, CET
4600 King Street
Suite 6K
Alexandria, Virginia 22302-1249
Phone: 703-998-4913
Fax: 703-931-8171

SECRETARY:

Mr. Howard S. Redman, Jr.
Carroll County (MD) Emergency Manager
1345 Washington Road
Westminster, MD 21157
Phone: 410-848-1488
Fax: 410-848-3794

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**REGION-20 821 MHz RPRC TECHNICAL COMMITTEE REPORT:
ANALYSIS OF THE REGION-28 PUC OBJECTIONS TO THE
REGION-20 821 MHz WINDOW 3 HP INTERREGIONAL COORDINATION**

APPLICANT - HARFORD COUNTY, MARYLAND

- General Comments: The new, as-designed, 40 dbu Harford County contours do not extend into New Castle County, DE.
- Channel 619: Objection: Adjacent to 618 in New Castle County, DE.
Response: New as-designed 25dbu contour does not reach New Castle County. Therefore, there should be no potential for harmful interference.
- Channel 622: Objection: Co-channel with City of Philadelphia, PA.
Response: As noted in the Region 28 response, the 5dbu contour does not reach the City of Philadelphia; Region-20 supports the MOZAIK contour maps supplied by Motorola. Therefore, there should be no potential for harmful interference.
- Channel 781: Objection: Adjacent to Channel 782 in New Castle County, DE.
Response: See response to Channel 619 above.

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APPLICANT - HOWARD COUNTY, MD.

- General Comments: Objection: Spectrally inefficient allocations.
 Response: The Region-20 821 MHz RPRC acknowledges Region-28's concern regarding (potential) spectrally inefficient allocations. Region-20 recognizes its responsibility to monitor such through the review/approval process.

Howard County requires 15 channels to meet the communications needs of over 1700 users. For explanation of how these needs are planned to be met, see the Howard County response letter of April 5, 2000 (attached), paragraphs 5, 6, and 7.

Region 20 supports the MOZAIK contours supplied to it by Motorola.

Howard County has voluntarily given up one more proposed 821MHz channel allocation (now reducing their total number of proposed 821 MHz channels to 13) due to an observed Region 20 conflict with Anne Arundel County, MD.

- Channels 604, 630, 724, & 756: Objection: Potential for Interference.
 Response: New as-designed system contours do not show the potential for harmful interference as described in the Region 28 objection.

APPLICANT - CARROLL COUNTY, MD.

- General Comments: Objection: 40 dBu contours extend into Pennsylvania.
 Response: The service 40dbu contours into PA are justified by the primary service area agreements established many years ago by *Memorandums of Understanding* MOU's between the adjacent dispatching jurisdictions. These MOU's antedate the establishment of the NPSPAC plan, and must be honored for the safety of the public. [See FCC **ORDER**, General Dockets Nos. 90-7 & 89-573, DA 99-2243, October 21, 1999, Paragraph 39 (attached).]

- Channel 817: Objection: Co-channel with Dauphin County.
 Response: The new as-designed 5 dBu system contour map does not show extension as far as Dauphin County, therefore there should be no co-channel problem.

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APPLICANT - UPPER MARYLAND EASTERN SHORE CONSORTIUM

- General Comments: Objection: Spectrally inefficient allocation.
 Response: The assignment of (10) channel pairs to this tri-county system was justified under the criteria contained in the Region 20 821 MHz plan.

 Objection: 41 dBu contours extend into Delaware.
 Response: Pursuant to FCC **ORDER** [*see* FCC **ORDER**, General Docket Nos. 90-7 & 89-573, DA 99-2243, October 21, 1999, paragraphs 27 - 29 (attached)], Region-28 cannot protect proposed unconstructed systems or the proposed future use of a channel by an existing 821 MHz licensee. Additionally, Region-28 cannot object to 41 dBu contours extending into Delaware, unless affected entities within Region-28 can prove they are "experiencing harmful interference". Therefore, any objection by Region-28 on the basis that the 41 dBu contours extend into Delaware in excess of the "3 mile out-of-boundary limitation rule", pursuant to both the Region-20 & 28 Plans, has been invalidated by the FCC **ORDER**.
- Channel 653: Objection: Co-channel with Lancaster County, PA at 39 miles.
 Response: The 5dbu MOZAIK contour does not reach Lancaster County. Therefore, there should be no harmful interference.
- Channels 661, 785 & 830: Same as Channel 653

APPLICANT - LOUDOUN COUNTY, VA.

- Channel 795 Objection: Co-channel with York County, PA.
 Response: The as-designed system contour maps show that the 5dbu contour does not penetrate York County, PA. Therefore, there should be no potential for harmful interference.

LICENSEE - STATE OF MARYLAND

- General Comments: As far as the State of Maryland channels are concerned, all of the 821MHz channels licensed to the State of Maryland were returned to the pool (and used for satisfying the requirements of other jurisdictions under the Region-20 Window 3), with some exceptions, which are shown in the proposed Region-20 Window 3 matrix (some of these channels assigned were not from the State of Maryland pool):

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- Channels 620, 655, 697, 701, and 742: State of Maryland licenses to be transferred to BWI Airport Authority, MD; others new.
- Channels 632, 726, 784, 794, and 830: State of Maryland licenses to be transferred to the University of MD at College Park, MD; others new.
- Channels 606, 611, 623, 726, and 784: State of Maryland licenses to be transferred to the State central booking facility (CBF) in downtown Baltimore for local use (some channel reuse with the College Park, MD system above); several of these channels are already licensed and in use at the CBF.