



Baltimore County  
Office of Budget and Finance

DOCKET FILE COPY ORIGINAL

Electronic Services/  
Telecommunications  
11112 Gilroy Road, Suite 101  
Hunt Valley, Maryland 21031-1302  
410-887-1877  
Fax: 410-887-1882

~~RECEIVED~~

~~AUG 22 2000~~

~~Federal Communications Commission  
Office of Secretary~~

~~RECEIVED~~

~~AUG 21 2000~~

~~FCC MAIL ROOM~~

August 16, 2000

Federal Communications Commission  
Office of the Secretary  
Ms. Magalie Roman Salas  
445 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554

Dear Ms. Salas,

Attached are four copies of our response to the *Fourth Notice of Proposed Rule Making* relate to Docket No. 96-86. We thank the Commission for allowing us this opportunity to voice our opinions on this important matter.

Should there be any problems or questions with our submittal, please do not hesitate to contact us at the above numbers

Sincerely,

Charles C. Dennis  
Chief, ES/T

No. of Copies rec'd 0+4  
List A B C D E

Come visit the County's Website at [www.co.ba.md.us](http://www.co.ba.md.us)



Printed with Soybean Ink  
on Recycled Paper

WT Docket No. 96-86  
Fourth Notice of Proposed Rule Making

*In the Matter of the Development of Operational, Technical, and Spectrum Requirements  
for Meeting Federal, State, and Local Public Safety Communication Requirements  
Through the Year 2010*

Reply Comments

Baltimore County Electronic Services and Telecommunications  
11112 Gilroy Road Suite 101  
Hunt Valley, Maryland 21031  
(410) 887-1877  
Charles C. Dennis, Chief

RECEIVED

AUG 21 2000

FCC MAIL ROOM

*Page 6, paragraph 9*

Baltimore County agrees with the non-trunking of interoperability incidents. However, on critical incidents we have found that recording of voice transmissions is essential. In order to continue recording incidents, it becomes necessary to route this audio back to the local PSAP for inclusion into the recording equipment. Thus, we should not limit or exclude the voluntary installation of a satellite receiver(s) within any jurisdiction. Jurisdictions may opt to place incidents they deem necessary to record on the frequency(ies) of those receivers to obtain wide area coverage.

*Page 7, paragraph 10 – 13*

Baltimore County disagrees with permissive trunking on interoperability frequencies. It is our contention that until such time that there is an authority appointed over the users of the system, there is not a guaranteed methodology that will eliminate the channels necessary in a timely manner. In most PSAP facilities, the operations personnel are not granted access to the system manager fields and in these cases they must rely on notification of a supervisor or system manager. In effect, contacting these persons results in a valuable waste of time especially when in most incidents the first 15 minutes are the most crucial.

*Page 16, paragraph 38*

Baltimore County has some concerns in reference to prioritizing the interoperability frequencies. Jurisdictions that intend to use the interoperability channels will do so for ease of operation and the security it provides. Rules governing when to use these assignments should be clearly defined prior to placing an operation on them. Once on, the operation should be allowed to terminate or at the very least, move to another operational frequency once the immediate danger is removed. To have an operation move based on priorities that another jurisdiction defines as "higher" will lead to either

confusion on the first or second incident or the lack of support by all jurisdictions within a region to adopt the standards

*Page 16, paragraph 39*

Baltimore County agrees with the NCC in that monitoring of a licensed channel should be mandatory at the PSAP. In addition we are in agreement that encryption should not be used at any time on these two frequencies.

*Page 19, paragraph 45*

Although Baltimore County agrees with the use of APCO 25 phase I technology, we also agree with the IAFC on using analog FM. At the very least, there should be a provision that allows units operating in analog mode be allowed some access even if only through one calling channel. In dictating all digital we may be eliminating some economically smaller jurisdictions from participating in the overall plan. In addition, in using digital technology, we may be limiting our coverage area, at least for the calling channel, or forcing a larger sub-division to place satellite receivers for coverage to the PSAP. Tests we have conducted conclude that in fringe areas a weak analog will be received where a weak digital, unable to fully reconstruct the voice, will not.