

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

In the Matter of

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

COMMENTS OF CONVENER OF 700MHZ REGION 51

The Convener of 700MHz Region 51, Ronald J. Gillory Sr. hereby submits his comments in response to the 4th Notice of Proposed Rulemaking in the above-referenced proceeding. As discussed in greater detail below, I strongly support the NCC's recommendation of P25 Phase I as the digital interoperability standard for the 700 MHz band. Region 51, Texas – Houston, including the counties of Shelby, Nacogdoches, San Augustine, Sabine, Houston, Trinity, Angelina, Walker, San Jacinto, Polk, Tyler, Jasper, Newton, Montgomery, Liberty, Hardin, Orange, Waller, Harris, Chambers, Jefferson, Galveston, Brazoria, Fort Bend, Austin, Colorado, Wharton and Matagorda is one of the areas where at least a portion of the 700 MHz band is available today!

Region 51, of which Houston is a part, is moving forward with the Regional Planning process at 700 MHz so that public safety within the region will be in a position to license frequencies in the band as soon as the equipment is ready. Both 806 MHz and 821 MHz frequencies have been depleted in the Region 51 metro areas. In fact, the UHF spectrum has also been depleted to the extent that the Houston Police Department and the Houston Fire Department cannot expand its existing UHF systems. The City of Houston is looking to the 700 MHz band to satisfy its future spectrum needs.

I support the NCC's recommendation of Project 25 Phase I as the digital interoperability standard. This standard is based on 12.5 kHz bandwidth, which allows for interoperability between the new 700 MHz band and legacy 800 MHz public safety systems. **I do not** support a mandatory transition to narrower bandwidth on the interoperability channels.

Any immediate use of the general use channels is also best handled by deploying Project 25 Phase I technology. Project 25 Phase I has been tested, planned and deployed under the guidance of local, state and federal users in the public safety community. Any migration plan to 6.25 kHz should be limited to the general use channels and targeted for a number of years in the future, once 6.25 kHz technology has matured and proven itself worthy of public safety consideration. 6.25kHz technology will most likely require higher signal to noise/interference ratios. Current noise floor conditions in the metro areas do not present a favorable operational area at this time thus raising system costs and overhead.

Public safety access to the 700 MHz spectrum is already several years into the process, but Region 51 still cannot get true 'on the street' deployment due to regulatory delays. I urge the Commission to adopt the NCC's recommended digital interoperability standard immediately so that we can have access to radio equipment in the 700 MHz band. The spectrum is available. Only the FCC's delay in accepting the NCC's recommendations is standing in the way of our ability to use it to protect and serve the citizens of Region 51.