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October 31, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: WT Docket 96-86

Dear Ms. Salas:

This is to inform the Commission that the undersigned and Mr. Glen Nash, President-Elect of the Association of Public-Safety Communications Officials-International, Inc. ("APCO") met today with the following Commission personnel to discuss APCO's position regarding standards for the 700 MHz Interoperability channels and a migration plan for the General Use channels:

- Clint Odom, Office of Chairman Kennard
- Adam Krinsky, Office of Commissioner Tristani
- Mark Schneider, Office of Commissioner Ness
- Bryan Tramont, Office of Commissioner Furchtgott-Roth
- Peter Tenhula, Office of Commissioner Powell
- Thomas Sugrue, Chief, Wireless Telecommunications Bureau
- Mark Rubin, Wireless Telecommunications Bureau
- Jeanne Kowalski, Wireless Telecommunications Bureau

During the meeting, we provided each of these individuals with a written summary of APCO's proposal, two copies of which are enclosed herewith for filing in the record for the above-captioned proceeding.

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Please contact the undersigned should the Commission have any questions.

Respectfully submitted,



Robert M. Gurss
Counsel for APCO

Attachment

cc: Clint Odom, Office of Chairman Kennard
Adam Krinsky, Office of Commissioner Tristani
Mark Schneider, Office of Commissioner Ness
Bryan Tramont, Office of Commissioner Furchtgott-Roth
Peter Tenhula, Office of Commissioner Powell
Thomas Sugrue, Wireless Telecommunications Bureau
Mark Rubin, Wireless Telecommunications Bureau
Jeanne Kowalski, Wireless Telecommunications Bureau
Mr. Glen Nash

BASIC ELEMENTS OF APCO'S PROPOSED MIGRATION PLAN

INTEROPERABILITY CHANNELS

- Adopt Project 25 Phase I now as interoperability standard
 - available now as ANSI standard
 - facilitates efficient unit-to-unit communication
 - provides common mode for interoperability between otherwise incompatible technologies. The 6.25 kHz technologies on the horizon will not be interoperable absent a common mode such as Project 25 Phase I.

GENERAL USE (and State) CHANNELS

- Allow 12.5 kHz operation now to facilitate early band implementation.
 - premature to require 6.25 kHz due to limitations of 6.25 kHz technology for public safety applications, which would delay use of 700 MHz band.
- Adopt 6.25 kHz migration plan for General Use channels only.
 - New systems installed after a future date must be 6.25 kHz capable, AND have Project 25 Phase I capability for Interoperability channels.
 - At a distant date, require any remaining 12.5 kHz operation on General Use channels to convert to 6.25 kHz capability.

SPECIFIC DETAILS OF APCO'S PROPOSED MIGRATION PLAN

Step 1: Immediate adoption of Project 25 Phase I as the Interoperability Standard. This will allow users and manufacturers to move forward now with existing technology to implement 700 MHz systems wherever the 700 MHz band is not blocked by television stations.

Step 2: As of December 31, 2006 OR within 6 months following FCC notice that at least 15 of the top 20 metropolitan areas (including at least 7 of the top 10 metropolitan areas) have been cleared of all relevant television stations (full power co-channel and adjacent channel stations), WHICHEVER IS LATER, all newly type-accepted radios for voice use in the band must have:

(i) the capability to provide one voice channel per 6.25 kHz, AND

(ii) must still meet the Project 25 Phase I (12.5 kHz) standard for the interoperability channels.

As discussed above, preserving 12.5 kHz as the interoperability standard is essential to maintain interoperability across technologies (TDMA/FDMA/TETRA). At the same time 6.25 kHz could provide greater efficiency, which may be particularly important for the General Use channels in the top 20 markets, once the spectrum is cleared in those areas. While the DTV transition is scheduled to end in 2006, statutory "loopholes" are likely to allow many television stations to remain on channels 60-69 well past that date.

Forcing manufacturers to produce 6.25 kHz capable radios (and forcing public safety users to purchase those radios) prior to the DTV transition would be an unnecessary burden.

An essential element of this Step 2 is that it does not discourage the immediate development and near term implementation of 700 MHz Project 25 Phase I 12.5 kHz systems. While radios will eventually need to have 6.25 kHz capability, those radios will also require Project 25 Phase I capability, which is consistent with the Project 25 Statement of Requirements. Thus, manufacturers will have an incentive today to invest in the development of Project 25 Phase I capable radios for the 700 MHz band, recognizing that such capability will be required even for future 6.25 kHz capable radios. Similarly, users must be able to install 12.5 kHz Project 25 Phase I equipment within the next few years safe in the knowledge that they will be able to continue operating that equipment throughout its normal life cycle.

Step 3: For the top 50 metropolitan areas, all General Use operations must be at 6.25 kHz by 10 years after the date established above in Step 2 (imposing the 6.25 kHz type-acceptance requirement). Interoperability channels would still be at 12.5 kHz operations to retain interoperability across technologies. This is intended to provide a minimum 10-year life cycle for “pure” 12.5 kHz radios (*i.e.*, without 6.25 kHz capability) purchased between “now” and the date established in Step 2, while mandating more efficient operations in major metropolitan areas on the General Use channels as of a date certain. Ten years is currently the generally accepted life span for many elements of a radio system, though there is evidence that this period may be shrinking as equipment is

increasingly being replaced prior to be “worn out” because of a need or desire to add new capabilities or capacity. On the other hand, a certain number of users are likely to continue using old equipment as long as possible. It must also be noted that infrastructure (base stations) will last much longer (typically more than ten years) than portable and mobile radios.

Step 4: For areas outside the top 50 metropolitan areas, all General Use operations must be at 6.25 kHz by 15 years after the date established above in Step 2 (imposing the 6.25 kHz type acceptance requirement). However, rural users should be allowed maintain 12.5 kHz operation indefinitely on a secondary basis.

Step 5: As of the date established in Step 2, the Commission should re-examine technological and marketplace developments as of that date and determine whether it is possible to develop a migration path for the subsequent transition a 6.25 kHz Interoperability standard. The key issue should be whether interoperability between various technologies (*e.g.*, TDMA and FDMA) will still require Project 25 Phase I interoperability at 12.5 kHz. Any such migration path will need to be graduated to ensure seamless interoperability as new equipment is placed in operation, and that users get a full life cycle from their Project 25 Phase I equipment.

[the foregoing is an excerpt from Comments filed by APCO in WT Docket 96-86]