

Jerry L. Barker, Chief of Police
50 North Alabama Street
Indianapolis, Indiana 46204



**POLICE DEPARTMENT
CITY OF INDIANAPOLIS**

Bart Peterson, Mayor

"Police and Community – Partners in Crime Prevention"

April 11, 2000

EX PARTE OR LATE FILED

The Honorable Michael K. Powell
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

98-237

RE: WT Docket No. 00-32

Dear Mr. Chairman:

I am writing you on behalf of the City/County/State of Indianapolis Police Department to express our concern about the FCC's intention to auction 50 MHz of spectrum in the 4940-4990 MHz (4.9 GHz) band, rather than allocating this critically needed spectrum to public safety for new broadband public safety applications.

The Indianapolis Police Department provides services to one of the fifty major cities in America. The citizens and businesses rely on our ability to respond efficiently and appropriately to their needs. This technology is increasingly critical to our ability to do so.

Back in 1996, the public safety community identified the need for 97.5 MHz of additional spectrum to meet our communications needs over the next ten years. Of this amount, the greatest amount of spectrum will be for advanced wideband and broadband technologies. To date, the FCC has allocated only 24 MHz of narrow band spectrum to public safety users in the new 746 MHz band. There are new emerging broadband technologies, custom tailored for Public Safety, appearing on the horizon that will require significantly wider bandwidths.

Solutions such as personal and vehicular area networks can wirelessly integrate a variety of existing and future devices to provide a safer environment for our officers. These include image and video cameras and viewers, mobile data terminals and all their peripheral devices, palmtops, wireless long range headsets, microphones, earpieces and voice recognition to allow complete hands free operation. Very large data and image files can be rapidly and wirelessly transferred within Wireless Local Area Networks (WLAN), enabling images, fingerprints of wanted or missing persons, video clips of robberies, maps and layouts to be downloaded into police vehicle mobile computers as they leave the precinct. This same technology will also allow wireless uploads of videos, images and reports from the police vehicle to the command center. WLAN technology will also enable command centers to employ full motion video for remote controlled robotics in terrorist and other highly dangerous operations, and monitoring of officers or suspect in officer assistance and high risk situations to allow on scene decision making and

[Signature]

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assistance based on video transmissions. This technology would allow real time transmission of video and imagery from surveillance helicopters to command centers.

We must have dedicated spectrum and systems that assure the safety of our personnel via immediate priority access, uninterrupted transmissions, security and guaranteed coverage and reliability. The proximity of the unlicensed 5 GHz spectrum to the proposed public safety 4.9 GHz allocation would allow us to leverage commercially developed broadband technologies and yet have the dedicated, reliable, secure and enhanced featured broadband solutions that we require.

The City/County/State of Indianapolis Police Department urges you and the Commission to recognize our broadband spectrum needs and allocate this much needed 4.9 GHz band to the public safety community. Obtaining this spectrum is a critical step for public safety agencies such as ours to access these new advanced broadband solutions for our mission critical applications.

Sincerely,

A handwritten signature in black ink, appearing to read "Jerry L. Barker".

Jerry L. Barker
Chief of Police

cc: Office of the Secretary
Ms. Magalie Roman Sallas
445 12th Street, SW
Washington, DC 20554



April 12, 2001

The Honorable Michael K. Powell
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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00-32

Dear Mr. Chairman:

The Major Cities Chiefs Association (MCC) hereby submits its comments in support of the Petition for Reconsideration recently filed by the National Public Safety Telecommunications Council (NPSTC). NPSTC's petition recommends the Commission reverse its decision to allow high power commercial base station operations in the 777-792 MHz band, adopt tighter restrictions on errant signals from 700 MHz band commercial operations and use a "zero tolerance" policy to address interference situations that do occur.

The Major Cities Chiefs Association is a professional association of police executives from the largest cities in the United States and Canada. The association provides a forum for urban police chiefs, sheriffs, and other law enforcement chief executives to discuss common problems encountered in the effort to protect and serve cities with populations in excess of 500,000 people.

Interference by commercial carriers to public safety systems is a problem that has recently been increasing in scope throughout the United States. As more and more commercial systems are deployed, the interference to public safety is increasing in direct proportion. Although all parties involved in the interference complaints usually work together to attempt to resolve the interference, it takes time and resources away from each party's prime directive—in the case of public safety protecting the health and property of the public.

It seems inconceivable that the Commission would knowingly permit commercial carriers in the 700 MHz band to operate in ways that would result in introducing interference problems into the new band. TIA's study, (submitted with NPSTC's petition) demonstrates that if high-power base station operations are permitted in the 777-792 MHz band, interference from those stations to public safety stations on adjacent frequencies is a foregone conclusion. Under the Commission's latest decision, public safety's only recourse in the new 700 MHz band would be to address interference that occurs after the fact on a case-by-case basis. That is totally unacceptable for critical public safety services and defies any logical planning for the effective use of this needed spectrum.

Building Partnerships To Prevent The Next Crime.

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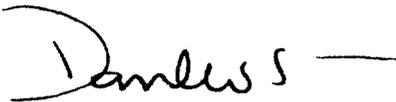
Members of the MCC look forward to using the 700 MHz band in the many areas of the country where it is available today with even greater use planned as TV is cleared from the band. We would like to be able to use the band without encountering the types of interference currently being experienced at 800 MHz. The Commission should craft rules aimed at preventing interference, rather than taking a "wait and see if it happens" attitude.

In addition to limiting base stations to the 747-762 MHz portion of the commercial allocation, we support NPSTC's other proposals to eliminate interference in the 700 MHz band. Specifically, we support the concept of "zero tolerance" for any interference by commercial carriers to public safety, the recommendations contained in the NPSTC petition regarding changes to section 27.53 of the rules, as well as the proposal to "limit the aggregate of interference from any number of out-of-band transmitters that raise the noise floor within any 6.25 kHz public safety channel by more than 3 dB above thermal noise." While we are not technical experts, we have confidence in TIA's engineering and analyses.

Unless public safety can use the new 700 MHz allocation (and other future spectrum allocations) without experiencing interference, the Commission will have failed to comply with Congress' directive to "ensure that public safety licensees continue to operate free of interference from any new commercial licensees." Furthermore, Congress' direct instructions that the Commission provides public safety with additional spectrum will be undercut.

In conclusion for the reasons stated above, the MCC vigorously supports NPSTC's Petition for Reconsideration in all aspects and urges the Commission to adopt the proposals outlined therein.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Darrel W. Stephens", followed by a horizontal line.

Darrel W. Stephens
Chief of Police

DWS/gh

Indianapolis Police Department
Office of the Chief of Police
50 North Alabama Street
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POLICE DEPARTMENT**

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Charlotte, NC 28202-2940

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