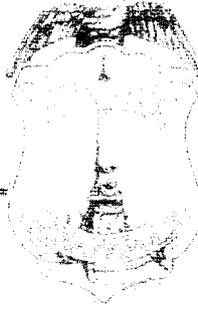


Jerry L. Barker, Chief of Police
50 North Alabama Street
Indianapolis, Indiana 46204



**POLICE DEPARTMENT
CITY OF INDIANAPOLIS**

Bart Peterson, Mayor

"Police and Community – Partners in Crime Prevention"

April 11, 2001

EX PARTE OR LATE FILED

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

00-32
98-237

Dear 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.

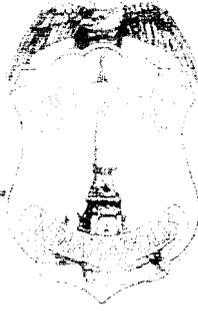
The Major Cities Chiefs Association is a professional association of police executives from the largest cities in the United States and Canada. The association provides a forum for urban police chiefs, sheriffs, and other law enforcement chief executives to discuss common problems encountered in the 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 directive - in 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.

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

Jerry L. Barker, Chief of Police
50 North Alabama Street
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**POLICE DEPARTMENT
CITY OF INDIANAPOLIS**

Bart Peterson, Mayor

"Police and Community – Partners in Crime Prevention"

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 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 "Jerry L. Barker".

Jerry L. Barker
Chief of Police

Indianapolis Police Department
Office of the Chief of Police
50 North Alabama Street
Indianapolis, Indiana 46204

FCC MAIL ROOM

APR 18 2001

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



UNIVERSITY POLICE
BRIGHAM YOUNG UNIVERSITY
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(801) 378-2222 / FAX (801) 378-0935



April 12, 2001

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

EX PARTE OR LATE FILED

RE: WT Docket No. 00-32

98-237

Dear Mr. Chairman,

I am writing you on behalf of the Brigham Young University 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 University Police Department was one of the first in the State of Utah to implement a trunked 800 MHz system for their public safety functions over 10 years ago. We service a community of 25,000 college students and a staff/faculty population of approximately 8,000 employees. We host visitors to campus ranging from foreign dignitaries, US political figures and officials as well as thousands of high school conferences students each year.

It is our understanding that the public safety community, in 1996, identified the need for 95 MHz of additional spectrum to meet communications needs in the public safety sector over the next ten years. Of this amount, the greatest need will be for advanced wideband and broadband technologies. The FCC response to this point has been to allocate 24 MHz to public safety users in the new 746 MHz band. The new emerging broadband technologies and applications that we see in the future will require significantly wider bandwidths than this allocation will afford.

Several representative public safety organizations, including APCO, IACP and Major Cities Chiefs have recently urged the FCC to allocate 50 MHz at 4.9 GHz for broadband public safety applications.

We fully support the above public safety organizations and we also urge you and the Commission to recognize our broadband spectrum needs and allocate this much needed 4.9 GHz band to the public safety community. This will help to facilitate public safety access to the advance broadband solutions for our applications, many of which are life critical responses.

Sincerely,

A handwritten signature in cursive script that reads "Larry A. Stott".

Larry A. Stott
Chief of University Police

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NOLA B. B'IMIT
Director

MICHAEL J. MAHN
Legal Counsel

(423) 622-1911
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**HAMILTON COUNTY "911"
EMERGENCY COMMUNICATIONS DISTRICT**

EX PARTE OR LATE FILED

April 11, 2001

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

98-239

RE: WT Docket No. 00-32

Dear Mr. Chairman:

I am writing you on behalf of the Hamilton County Emergency Communications District of Tennessee to express our concern about the FCC's intension 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.

We receive over 225,000 calls each year and service more than 307,000 citizens.

Back in 1996, the public safety community identified the need for 95 MHz of additional spectrum to meet our communications needs over the next ten years. Of this amount, the greatest need will be for advanced wideband and broadband technologies. To date, the FCC has allocated 24 MHz to public safety users in the new 746 MHz band. There are new emerging broadband technologies and applications appearing on the horizon that will require significantly wider bandwidths than this allocation.

Several of our representative public safety organizations, including APCO, IACP, and Major Cities Chiefs, have recently urged the FCC to allocate 50 MHz at 4.9 GHz for broadband public safety applications.

The Honorable Michael K. Powell
Chairman
April 11, 2001
Page Two

We fully support the above public safety organizations and we also urge 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,



Donald L. Allen
Chairman

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

**HAMILTON COUNTY "911"
EMERGENCY COMMUNICATIONS DISTRICT**

3300-A Amnicola Highway
Chattanooga, Tennessee 37406

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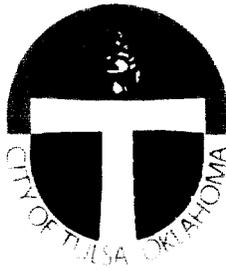
APR 18 2001

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



M. Susan Savage
MAYOR
•
918 • 596 • 7411



OFFICE OF THE MAYOR

200 CIVIC CENTER

• TULSA, OKLAHOMA •

74103

April 12, 2001

EX PARTE OR LATE FILED

Michael K. Powell, Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

98-237

Re: WT Docket No. 00-32

Dear Chairman Powell:

On behalf of the City of Tulsa, I would like to express our concern about the Federal Communication Commission'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 city of Tulsa is home to almost 400,000 citizens, but over 750,000 are served by our Public Safety Communications systems. Tulsa has always been and continues to be a leader in implementing technology for the benefit of providing the best public safety response to any given situation. The Tulsa Police Department has over eight hundred sworn officers and the Tulsa Fire Department has six hundred sworn firefighters. Both departments and other agencies take advantage of current technologies to perform their jobs and save lives. The City of Tulsa has come to rely on new technologies to provide the best protection possible for its citizens and those of surrounding communities.

In 1996 the Public Safety Wireless Advisory Committee was formed to advise Congress on the need for future frequency spectrum for the public safety community. As a result, this committee in cooperation with the public safety community recommended that an additional 95 MHz of spectrum be set aside to meet our communications needs over the next ten years. Of this amount, the greatest need will be advanced wideband and broadband technologies. To date, the FCC has allocated 24 MHz to public safety users in the new 746 MHz band. However, there are new emerging broadband technologies and applications appearing on the horizon that will require significantly wider bandwidths.

Broadband applications could provide solutions such as personal and vehicular area networks to 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 and wireless long range headsets, microphones, earpieces and voice recognition to allow complete hands free operation. Large data and image files can be

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Michael K. Powell, Chairman
April 12, 2001
Page Two

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 an incident 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 suspects in officer assistance and high risk situations to allow on scene decision making and assistance based on video transactions.

Additionally, broadband fire solutions could include applications such as personal area networks (PAN) that can wirelessly integrate a variety of lifesaving tools into the firefighter's suit and helmet. To include biometric and environmental sensors, 3D location, video and thermal imaging cameras, wireless microphones and earpieces, and voice recognition to allow complete hands-free and wire-free operation of all communications. High speed wireless data links transmit this vital information to fire ground incident command centers, allowing them to constantly monitor the location and vital signs of all firefighters and help them navigate through smoke-filled burning buildings. These technologies could provide a critical link for quickly locating disoriented or downed firefighters before fatal injuries are sustained. Again, WLAN technology would enable graphics such as maps, images and building blueprints to be downloaded into fire vehicle mobile computers as they leave the firehouse. WLAN technology would also enable fire ground command centers to employ full motion video for remote controlled robotics in intense fires, hazardous material and bomb disposal and dangerous search and rescue operations. This technology would allow real time transmission of video and imagery from aircraft to fire ground commanders and for police surveillance.

Although unlicensed consumer oriented broadband technologies are on the horizon in the nearby 5 GHz band, public safety agencies cannot rely on unlicensed spectrum for our mission critical applications. We must have dedicated spectrum and systems that assure the safety of our personnel via immediate priority access, uninterrupted transmissions and guaranteed coverage and reliability. The proximity of this unlicensed band to the proposed public safety 4.9 GHz allocation allows us to leverage such standards based broadband technologies and yet have the dedicated, reliable, secure and enhanced featured broadband solutions that we require for our mission critical applications.

The City of Tulsa strongly 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,


M. Susan Savage
Mayor

cc: Ms. Magalie Roman Sallas, Office of the Secretary

OFFICE OF THE MAYOR
200 CIVIC CENTER
TULSA, OKLAHOMA 74103

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