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Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WT Docket No. 99-87/RM-9332

Dear Ms. Dortch

The Wisconsin State Patrol (WSP) would like to express its concern regarding the above-referenced proceeding on new rules related to implementing migration to narrowband land mobile radio systems operating in the VHF High Band (150-170 MHz) and UHF (421-512 MHz) frequencies. WSP strongly supports the APCO petition for reconsideration of this matter.

WSP operates statewide voice and data systems serving state, local, federal, and tribal public safety agencies throughout the State of Wisconsin. WSP is also a lead agency in the development, maintenance, and operation of statewide interoperability channels and networks.

In order to maintain and grow these interoperability networks, public safety licensees must be able to expand existing systems with compatible equipment. The current date of January 17, 2004 establishing a deadline to accept modification of existing 25 kHz systems will prevent public safety licensees from adding critical capacity and coverage for existing systems. Limiting new systems to 12.5 kHz-only operation, as required in the Second R&O, will prevent those new systems from communicating with existing licensees who continue to operate 25 kHz channels. Therefore, new wideband licenses should be permitted where they are integrated into existing wideband systems.

Restrictions on equipment certification, manufacturing, and importation should coincide with restrictions on licensees. State and local governments must be able to add capacity on an as-needed basis to address vital public safety requirements, replace broken and worn-out radio units on a piecemeal basis, and to phase-in radio system upgrades to wideband systems while accommodating budgetary constraints.

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The Commission must permit 25 kHz bandwidth operation for mobile data and equivalent voice paths TDMA and other multi-bandwidth mode equipment can provide important efficiencies for certain types of public safety radio systems As noted in a previous letter, WSP is in the process of deploying a second generation statewide mobile data system Mobile data systems provide critical functionality to modern public safety communications operations, but require wideband (25 kHz) channels in a manner that is consistent with maximum spectral efficiency Such mobile data systems provide same or better equivalent throughput than systems operating on narrowband channels

WSP supports a narrowband date certain of January 1, 2013, with these critical exceptions

- data systems with 19 2 kbps speeds and higher must be permitted to operate in wideband (25 KHz) channels
- voice systems utilizing four or more slots must be permitted to operate in wideband (25 KHz) channels

Respectfully submitted,

Wisconsin State Patrol

By _ David L Collins
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Superintendent