

Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., SW  
Washington, DC 20554

WT Docket No. 96-86  
Comments

To: The Commission

Bay Electronics, Inc. wants to advise the FCC of a number of concerns it has about the proposal to require radios using only the 700 MHz wideband general use channels to be capable of operating on the interoperable channels as well. Although we support interoperability, we do not believe this specific requirement is reasonable or necessary. It is of even greater concern because of the FCC's decision to adopt the SAM standard for all 700 MHz wideband equipment.

Here are some of the reasons we think the proposal is a bad idea:

At earlier stages of this proceeding, the FCC correctly decided that public safety users are entitled to some discretion in how they design and operate their systems. We all have certain unique operating requirements depending on factors such as whether we are in urban or rural areas, the types of communications we intend to handle, and the frequency with which we need to coordinate with other organizations. The FCC's active role in encouraging interoperability is welcome, particularly for voice communications where everyone will be using a common language. However, we had planned on and need the option of operating radios on the wideband general use channels to meet our specific wideband data applications. Forcing us to have SAM capability in those radios certainly will make that difficult and may make it impossible.

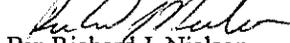
One major issue is that SAM-enabled equipment is not available today; it isn't clear when it will be. That means that all wideband deployment, and even wideband planning, will have to be put on hold for the time being. It took the FCC and the industry a long time and a lot of effort to get access to this 700 MHz spectrum. We want to use it as soon as possible.

Another concern is that this additional requirement will increase the cost of 700 MHz wideband equipment by some as yet unknown amount. It also is expected to require more infrastructure to get the same coverage. That may not be an issue in urban areas where public safety users already use multiple sites. It will have a major cost impact on rural systems if they have to build additional sites just to make the equipment meet a standard for a use they don't anticipate activating.

If the FCC believes a wideband data "pipe" with interoperability capability is essential, it should look to the recent 4.9 GHz allocation. Because of the FCC's decisions, this exclusively public safety Wi-Fi-like allocation is being populated by inexpensive wideband devices and enhanced by mesh networking techniques that will support on-scene communications among entities on even an ad hoc basis. Some users may decide they want to have that type of data interoperability at 700 MHz in which case there are channels designated for just that purpose. However, a rule that imposes that obligation on all 700 MHz wideband data users is economically unjustified and operationally unnecessary.

Thank you for considering our comments on this very important matter.

Submitted by,  
Bay Electronics, Inc. x

  
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