

**Before the  
FEDERAL COMMUNICATIONS COMMISSION**

**Washington, D.C. 20554**

In the Matter of )  
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The Development of Operational, Technical and )  
Spectrum Requirements for Meeting Federal, ) WT Docket No. 96-86  
State and Local Public Safety Communication )  
Requirements Through the Year 2010 )  
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**Comments of the  
New York State Office for Technology  
Statewide Wireless Network**

**May 20, 2005**

**I. INTRODUCTION**

1. On January 7, 2005 the Federal Communications Commission (“Commission”) released the Fifth Memorandum Opinion and Order, Sixth Report and Order, and Seventh Notice of Proposed Rulemaking in the above captioned matter, FCC 05-9. In this proceeding, the Commission sought to take certain actions intended to encourage the transition to narrowband technology in the 764-776 MHz and 794-806 MHz public safety bands (700 MHz Public Safety Band). The Commission also sought to conform certain technical rules

governing this band to industry consensus standards, and seek comment on various proposals governing both technical and operational rules in this band.

2. The New York State Office for Technology, on behalf of the State of New York, is in the process of procuring a new Statewide Wireless Network (SWN) for State, Federal and Local Governmental entities that operate within New York State's geographic borders. SWN will provide an integrated mobile radio communications network that will be utilized by both Public Safety and Public Service agencies in New York State. It will provide a digital, trunked architecture that will offer both voice and data capabilities. It will be used in day-to-day operations, as well as for disaster and emergency situations, to more effectively and efficiently coordinate the deployment of all levels of government resources to such incidents. It will also enhance international coordination along the US/Canadian border, and will play a critical role in supporting the homeland defense efforts within the State of New York.

3. The State of New York had been deeply involved with the activities of the FCC's Public Safety National Coordination Committee (NCC) – having been an active participant for its entire duration. In the Seventh Notice of Proposed Rulemaking (NPRM) the Commission tentatively concluded to adopt the following NCC proposals:

- Adopt a 700 MHz wideband data standard;
  - Require wideband mobile and portable radios be capable of operating on all the wideband interoperability channels using the wideband data standard.
- Update the interoperability standards set forth at Section 90.548 of the Commission's rules to reflect updated industry standards;

- Update the encryption standards set forth at Section 90.553(e) of the Commission's rules to reflect updated industry standards; and
  - Adopt minimum signal strength design criteria for public safety systems operating in the 700 MHz Public Safety Band.
4. In the same NPRM, the Commission tentatively concluded not to adopt the following NCC proposals:
- Requiring the use of standard channel nomenclature for interoperability channels;
  - Requiring mobile and portable units certified for use under Part 90 of the Rules be capable of displaying standardized interoperability channel labels alphanumerically if the radios are equipped with alphanumeric displays;
  - Revise the term “State Interoperability Executive Committee” to “Statewide Interoperability Executive Committee”;
  - Mandate the use of State Interoperability Executive Committees; and extend their jurisdiction to interoperability channels in all public safety bands; and
  - Make certain procedural changes to the Commission’s review of 700 MHz regional plans.

## **II. WIDEBAND INTEROPERABILITY STANDARD**

5. The State of New York believes the Commission should adopt the NCC proposal for a standard air interface, TIA-902, as a good start to achieve 700 MHz interoperability on the FCC designated interoperability channels.
6. However, it should be noted and clearly understood that it will take more than a standard air interface to achieve true interoperability. A good parallel would be to consider the narrowband voice interoperability standards. The air interface standard is ANSI-

102.BAAA. Digital radios require a common air interface in order to exchange information that can be properly decoded at the receiver. At least this conveys digital information. In order to convey speech information, the analog speech has to be converted to digital and then processed in a vocoder to achieve bandwidth compression and forward error correction (ANSI-102.BABA) suitable for a narrowband land mobile environment, and the reverse at the receiver. Thus we have the common air interface and the application standards. With both of these, interoperable transmission and reception of speech can occur.

7. In the case of transmitting data, we also need a common air interface and application standards. In the case of the narrowband radio, we have the ANSI-102.BAAA common air interface standard, and a packet data standard, ANSI-102.BAEB. This allows data to be presented in a standard electrical interface and conveyed in a similar manner to a receiver's standard electrical interface. However, the nature of the data being transmitted, whether it be text, database, video, or what ever, is not standardized in the FCC Rules to complete the "application" standards.
8. In the case of 700 MHz wideband data, the TIA-902 standard has been recommended, and this takes care of the common air interface for FCC designated interoperability channels, but there is not standard for the applications.
9. For this reason, adoption of the NCC recommendation for TIA-902 is only a good start toward achieving 700 MHz wideband data interoperability. As the FCC has designated an application standard for narrowband voice, it should now seek also to establish appropriate application standards for data transmission.

### **III. THE COMMISSION SHOULD UPDATE THE INTEROPERABILITY STANDARDS TO THEIR CURRENT VERSIONS.**

10. ANSI and TIA standards are periodically updated. Currently FCC Rule Sections 90.548 and 90.553 require updating. The Commission is urged to track these changes in the rules.

### **IV. THE COMMISSION SHOULD RECONSIDER SEVERAL NCC PROPOSALS THEY TENTATIVELY DECIDED NOT TO ADOPT**

11. The State of New York believes the Commission should reconsider some of the proposals they have tentatively decided not to adopt. The first item involves the requirement and codification of standard nomenclature for narrowband interoperability channels.

12. We believe there is inconsistency in the Commission's policy toward fostering interoperability by taking a stance to not require this standardized nomenclature. On one hand, the Commission has required a set of technical standards for all 700 MHz narrowband interoperability channels, while on the other hand, the naming of those channels has been left without standardization.

13. In the Emergency Medical Service, standard channel naming has been codified in the Rules at 90.20(d)(66)(i) where it states: "For uniformity in usage, these frequency pairs may be referred to by channel name as follows:"

e.g., 463.000 [base and mobile] 468.000 [mobile] MED-1

14. The lack of policy requiring standardization could lead to communication breakdown between different agencies responding to an emergency. Excellent examples of how this lack of standardization of mutual aid channel naming conventions created operational communication failures have been reported by the State of California in both PSWAC

and NCC committee deliberations. In agreement with the NCC, we believe that a uniform interoperability channel naming convention is absolutely essential and must be instituted on all FCC designated interoperability channels.

15. Similarly, not mandating the display (on radios equipped with displays) of standardized interoperability channel nomenclature is also detrimental for public safety. The State does not see any reason for dropping this requirement, since 700 MHz interoperability channels are common across the country. In responding to an emergency, rapid coordination of resources is of extreme importance. A standard channel display naming convention would not only simplify the task of coordinating resources, but also prevent confusion, which could result in a danger to life and property for both responders and civilians alike.

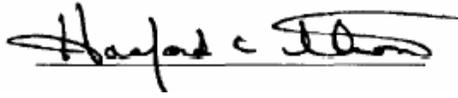
16. We strongly urge the Commission to reconsider standard channel nomenclature, including on all FCC designated interoperability channels, and display of such where available on radios.

17. The State believes the name change from “State” to “Statewide” for the SIEC is not a trivial matter. An SIEC should have a statewide all-inclusive nature. While the states have this role assigned to them by FCC Rule 90.525, the FCC also has offered a default responsibility to the Regional Planning Committees in 90.525(b). In this alternative, the NCC is charged with exercising a statewide responsibility, even though it is not a state.

## **11. SUMMARY**

18. We thank the Commission for the opportunity to comment on these matters and look forward to favorable action as identified above

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Hanford C. Thomas". The signature is written in a cursive style with a horizontal line underneath the name.

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