

The Region 45 (Wisconsin) 700 MHz Regional Planning Committee (Region 45) files these reply comments in the above-referenced proceeding. Among the proposals to accommodate broadband technologies in the Upper 700 MHz public safety allocation, the "Optimization Plan" advocated by Access Spectrum, Columbia Capital, Intel, and Pegasus is especially encouraging and offers additional potential in public safety broadband deployment in the 700 MHz band. Region 45 is interested in further pursuing the potential benefits associated with the Optimization Plan proposal as proposed by Access Spectrum, L.L.C., Intel and others.

As the proposed Optimization Plan makes changes in both public safety and commercial spectrum in the Upper 700 MHz band, proper consideration of this proposal is not possible under the current notice of proposed rulemaking, which states that issues concerning the A and B Blocks are not within the scope of this proceeding. In order to enable full consideration of this proposal, its benefits and to identify how public safety broadband deployment can further benefit from the role current A and B block licensees will play in such an Optimization Plan, Region 45 urges the Commission to make it possible to consider the A and B Block issues identified by the Optimization Plan and how they can benefit public safety broadband deployment.

Accordingly, the Commission should either expand the scope of the current proceeding to include the A and B Block issues, or else it should adopt a independent notice of proposed rulemaking that seeks specific comment on the A and B block issues and how then can contribute to improving public safety broadband deployment in the 700 MHz band. Either approach would allow for additional public comment on the Optimization Plan and would enable proper consideration of this proposal, which offers public safety the highest degree of adaptability, capability and resources of the solutions proposed thus far in this docket.

Region 45 supports providing regions with the flexibility to aggregate and disaggregate channels from 50 khz to 1.25 MHz, with the potential for a 5 MHz channel.

Radios operating in the wideband/broadband non-interoperability spectrum should not be required to

support the interoperability channels or have "must carry" interoperability capability.