



October 4, 2006

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

Re: WT Docket 96-86
WT Docket 06-150
WT Docket 06-169

Dear Ms. Dortch:

Pursuant to Section 1.1206(b)(2) of the Commission's Rules, this is to notify you that on October 3 2006, Steve Sharkey and Stuart Overby, met with Michael Wilhelm, John Evanoff, and Zenji Nakazawa of the Public Safety and Homeland Security Bureau and Scott Stone and Timothy C. Maguire of the Wireless Telecommunications Bureau regarding the above captioned proceedings.

During the meetings we discussed the attached presentation regarding options of maximizing the utility of the 700 MHz band for meeting the communications needs of public safety, Critical Infrastructure and Commercial operations.

Pursuant to the Commission's Rules, one copy of this notice is being filed electronically with the Commission. If you require any additional information please contact the undersigned at (202) 371-6953.

Sincerely,

/s/ Steve B. Sharkey

Steve B. Sharkey, Director
Director, Spectrum and Standards Strategy

Cc: Michael Wilhelm
John Evanoff
Zenji Nakazawa
Scott Stone
Timothy C. Maguire

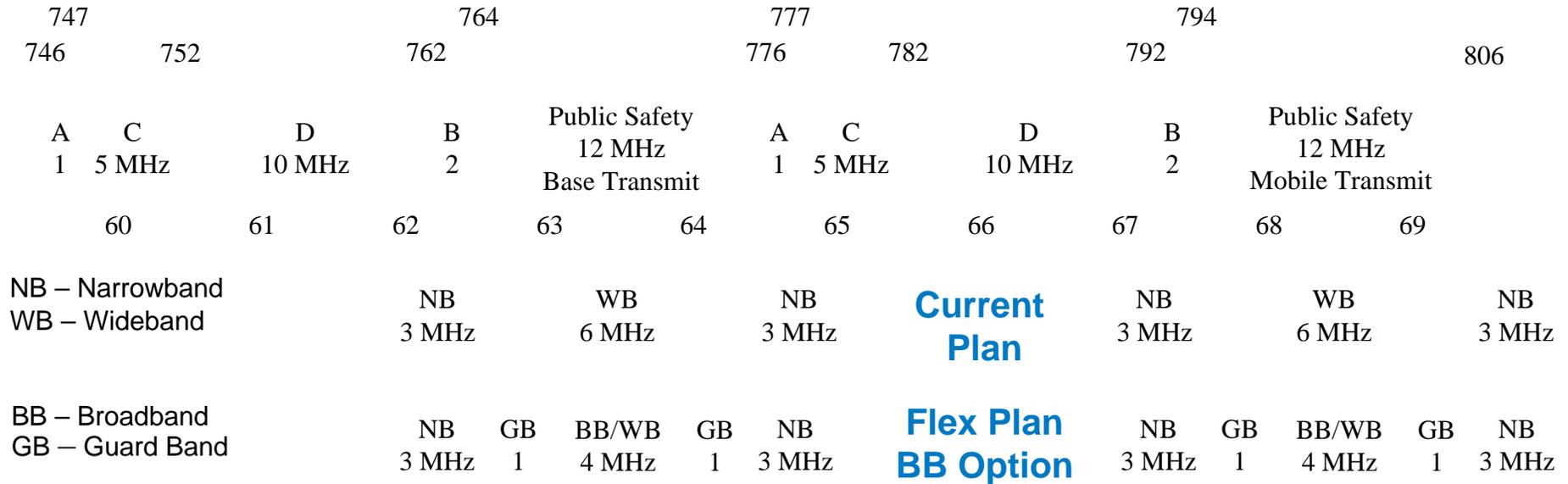


700 MHz

October 3, 2006



Upper 700 MHz Band



Consolidating narrowband channels with flex plan would reduce internal guardbands and provide additional flexibility for broadband deployment



Considerations:

- Cost to move embedded base of radios
- International coordination

Minimal Impact to Convert Imbedded P25 700 MHz Equipment to New Plan

550-600K dual band 700/800 mobiles/portable deployed

Very high confidence these mobiles/portables can operate on new 700 plan by simple code plug programming, i.e., no change in hardware or firmware

For units fielded but not yet operating on 700 MHz, no incremental costs incurred as code plug programming will need to be done anyway, even if plan were not changed

Only a few P25 voice base stations are already operating in current 764-767 MHz block

Translation of base stations to new narrowband block comparable to tuning channels for any system deployment

RPC plan/coordination/licensing approval for frequency translation

No hardware/firmware change

Technician time to tune site cavity filters, etc. to new frequencies

Access Spectrum Proposal

Current Band Plan

| | | | | | | | | | | |
|--------|------------|-------------|--------|--|-----|--------|------------|-------------|--------|--|
| 746 | 747 | 752 | 762 | 764 | 776 | 777 | 782 | 792 | 794 | 806 |
| A 1 | C 5 MHz | D 10 MHz | B 2 | Public Safety 12 MHz Base Transmit | | A 1 | C 5 MHz | D 10 MHz | B 2 | Public Safety 12 MHz Mobile Transmit |
| 60 | 61 | 62 | 63 | 64 | 65 | 66 | 67 | 68 | 69 | |

Access Spectrum Proposed Band Plan

| | | | | | | | | | |
|------------|-------------|----------------------|--|-----|----------------------|-------------|----------|--|----|
| 746 | 751 | 761 ^{762.5} | 776 | 781 | 791 ^{792.5} | 806 | | | |
| C 5 MHz | D 10 MHz | A 1.5 | Public Safety 13.5 MHz Base Transmit | | C 5 MHz | D 10 MHz | A 1.5 | Public Safety 13.5 MHz Mobile Transmit | |
| 60 | 61 | 62 | 63 | 64 | 65 | 66 | 67 | 68 | 69 |

- Increases PS band to 27 MHz total w/ 23 MHz non-GB
- Moves former A & part of B block GB's into PS
- Provides Greater WB/BB Flexibility
- Shifts C&D blocks down by 1 MHz

| | | | | | | | | | | | | |
|---------------|---------------|---------------|-------------|-------------|---------|----------------------------------|---------------|-------------|---------------|-------------|-------------|---------|
| BB 3 MHz | GB 1 | WB 2.5 MHz | NB 3 MHz | NB 3 MHz | GB 1 | BB/WB Mix (Note: one example) | BB 3 MHz | GB 1 | WB 2.5 MHz | NB 3 MHz | NB 3 MHz | GB 1 |
| BB 5.5 MHz | GB 1 | NB 3 MHz | NB 3 MHz | GB 1 | BB only | BB 5.5 MHz | GB 1 | NB 3 MHz | NB 3 MHz | GB 1 | | |
| GB 1 | WB 5.5 MHz | NB 3 MHz | NB 3 MHz | GB 1 | WB only | GB 1 | WB 5.5 MHz | NB 3 MHz | NB 3 MHz | GB 1 | | |



Critical Infrastructure

Motorola and UTC filed in support of licensing Nextel 2+2 MHz returned spectrum to Critical Infrastructure

Provides interoperability with public safety

Helps meet CI need for spectrum

Implemented under current technical rules

1+1 MHz - fully usable for narrowband voice

1+1 MHz – system design would need to consider interference
adjacent to base and mobile transmit broadband deployments

Revised 700 MHz structure would require new approach to providing CI spectrum

Revised 700 MHz Plan with Accommodation for CI

| | | | | | | | | | | | | | | |
|--------------------------|--------|---------|---------------|---------|-------|--------|---------|---------------------|---------|-----|---------|-------|-------|----|
| 746 | 751 | 761 | 762.5 | 775 | 776 | 781 | 791 | 792.5 | 805 | 806 | | | | |
| C | D | A | Public Safety | CI | C | D | A | Public Safety | CI | | | | | |
| 5 MHz | 10 MHz | 1.5 | 12.5 MHz | | 5 MHz | 10 MHz | 1.5 | 12.5 MHz | | | | | | |
| | | | Base Transmit | | | | | Mobile Transmit | | | | | | |
| 60 | 61 | 62 | 63 | 64 | 65 | 66 | 67 | 68 | 69 | | | | | |
| | | BB | GB | WB | NB | NB | CI | BB/WB Mix | BB | GB | WB | NB | NB | CI |
| | | 3 MHz | 1 | 2.5 MHz | 3 MHz | 3 MHz | 1 | (Note: one example) | 3 MHz | 1 | 2.5 MHz | 3 MHz | 3 MHz | 1 |
| Flexible WB/BB Scenarios | | BB | GB | NB | NB | CI | BB only | | BB | GB | NB | NB | CI | |
| | | 5.5 MHz | 1 | 3 MHz | 3 MHz | 1 | | | 5.5 MHz | 1 | 3 MHz | 3 MHz | 1 | |
| | | GB | WB | NB | NB | CI | WB only | GB | WB | | NB | NB | CI | |
| | | 1 | 5.5 MHz | 3 MHz | 3 MHz | 1 | | 1 | 5.5 MHz | | 3 MHz | 3 MHz | 1 | |

PS

PS

- **Increases PS spectrum to 25 MHz total/23 MHz non-guardband**
- **Increases spectrum for BB and/or WB depending on RPCs decision**
- **Maintains current 30 MHz base/mobile pairing structure**
- **Simplifies protection of voice systems & future designs**
- **Simplifies potential for seamless mobility /w adjacent broadband systems**
- **Incurs minimal impact to convert imbedded P25 700 MHz equipment to new plan**
- **Provides CI with 1+1 MHz spectrum under guardband band manager technical rules**
- **Provides 1+1 MHz guardband under PS control**