

October 23, 2006

Via Electronic Filing

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

Re: Transmittal of Report by 700 MHz Technical Working Group
Former Nextel Communications, Inc. Upper 700 MHz Guard Band Licenses and Revisions to Part 27 of the Commission's Rules; Development of Operational, Technical and Spectrum Requirements for Meeting Federal, State and Local Public Safety Communications Requirements Through the Year 2010
WT Docket Nos. 06-169 and 96-86

Dear Ms. Dortch:

A few months ago, the major public safety groups identified a set of implementation issues that must be addressed as a pre-condition for their support of the Broadband Optimization Plan proposed by Access Spectrum, LLC and Pegasus Communications Corp. in the *Public Safety 700 MHz Broadband* proceeding.¹ The two principal concerns described in the *July 31 Letter* are the reprogramming of existing public safety radios and the implementation of the plan in Canadian border states, and these issues are also referenced in the *A&B Block NPRM*.² In order to develop recommendations for resolution of these issues, Access Spectrum and Pegasus joined with manufacturers and public safety entities to form an informal group of technical specialists called the 700 MHz Technical Working Group (TWG). The meetings were regularly attended by representatives from the National Public Safety Telecommunications Council (NPSTC), the State of New York, Motorola, M/A-Com, Pegasus Communications Corp. and Access Spectrum, LLC, and representatives of the Association of Public-Safety Communications Officials-International, Inc. (APCO),

¹ Letter from Wanda McCarley, Association of Public-Safety Communications Officials-International, Inc.; Harlin R. McEwen, International Association of Chiefs of Police; and Alan Caldwell, International Association of Fire Chiefs, to Catherine Seidel, FCC, WT Docket No. 96-86 (July 31, 2006) (*July 31 Letter*).

² *Former Nextel Communications, Inc. Upper 700 MHz Guard Band Licenses and Revisions to Part 27 of the Commission's Rules; Development of Operational, Technical and Spectrum Requirements for Meeting Federal, State and Local Public Safety Communications Requirements Through the Year 2010*, Notice of Proposed Rulemaking, 21 FCC Rcd 10413, ¶ 5 (2006) (FCC 06-133).

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International Association of Chiefs of Police (IACP) and International Association of Fire Chiefs (IAFC) were kept abreast of the TWG's progress.

The 700 MHz Technical Working Group has now completed a report addressing the reprogramming and Canada issues. The report contains the results of the deliberations of the Technical Working Group and contains meaningful contributions from all the parties participating in the TWG. We request that the "Report of the 700 MHz Technical Working Group" be included in the record of the above-referenced proceedings. Inclusion of the report in the record will enable the Commission to have the benefit of the extensive work of the TWG. NPSTC has asked us to state that it agrees with placing the report in the record of the proceedings. Because the TWG report was completed so recently, NPSTC and other public safety associations are still reviewing the analysis and recommendations.

Respectfully submitted,

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Attachment

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