

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Development of Operational, Technical and Spectrum Requirements for Meeting Federal, State and Local Public Safety Communications Requirements Through the Year 2010)	WT Docket No. 96-86
)	
Service Rules for the 698-746, 747-762 and 777-792 MHz Bands)	WT Docket No. 06-150
)	
Former Nextel Communications, Inc. Upper 700 MHz Guard Band Licenses and Revisions to Part 27 of the Commission's Rules)	WT Docket No. 06-169
)	
Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band)	PS Docket No. 06-229
)	

COMMENTS OF MADISON COUNTY COMMUNICATIONS DISTRICT (MCCD)
a.k.a. Huntsville-Madison County, Alabama 9-1-1 Center (HMC 9-1-1)

Huntsville-Madison County, Alabama 9-1-1 Center (HMC 9-1-1) hereby submits these comments in response to the Commission's Further Notice of Proposed Rulemaking in the above-captioned proceedings.

HMC 9-1-1 is the combined communications operation for every local Law Enforcement, Fire & Rescue, and Emergency Medical Services (EMS) provider serving the cities of Huntsville, AL and Madison, AL as well as Madison County Alabama. It provides emergency telephone service (9-1-1) calltaking and responder dispatching activities for these cities and Madison County. In carrying out our mission, we are dependent on use of the RF spectrum now and in the future to meet our Public Safety responsibilities.

HMC 9-1-1 respectfully requests the FCC to reconsider the current proposed plan for the 700 MHz band. While a national network might be a benefit to some cities and certainly has some advantages, it is our position that public safety agencies should be able to retain the ability to license, own, and operate their own high-speed data systems in the 700 MHz band in addition to an option for a national network.

By retaining the option to own their systems, public safety agencies will be able to decide on their own coverage area, and can implement the system expeditiously rather than having to wait until a national provider decides that they are ready to enter a local market. We are truly concerned for some of our smaller cities and communities, as a national provider will likely delay extending coverage to these less economically viable markets.

HMC 9-1-1 is also concerned about the level of local sales & technical support that would be made available from a single national provider. Today, our public safety agencies have the ability to choose from a number of products and vendors for their wireless communication needs. A one-size-fits-all solution, limiting the system choices of vendors and equipment has historically not been well received by the public safety community.

In short, open competition is always better for the end-user.

The creation of a monopoly for the successful bidder of this nation-wide high-speed data system raises serious concerns regarding the quality of service that can be expected for mission critical data communications. Today, wireless communication providers must compete with one another for public safety business. This has a direct and positive impact on the quality of service. If the expected level of service is not met by one vendor, another can be chosen to provide a higher level of service.

We feel that dependence on a single national provider of a high speed data network would leave local governments vulnerable should the national provider be unable to meet the needs of a particular locality. A local community would have not other options for 700 MHz data under the proposed plan. We feel this is dangerous for Public Safety.

Respectfully submitted,

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