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

In the Matter of	)	
	)	
Service Rules for the 698-746, 747-762 and 777-792 MHz Bands	)	WT Docket No. 06-150
	)	
Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems	)	CC Docket No. 94-102
	)	
Section 68.4(a) of the Commission's Rules Governing Hearing Aid-Compatible Telephones	)	WT Docket No. 01-309
	)	WT Docket No. 03-264
Biennial Regulatory Review – Amendment of Parts 1, 22, 24, 27, and 90 to Streamline and Harmonize Various Rules Affecting Wireless Radio Services	)	
	)	WT Docket No. 06-169
Former Nextel Communications, Inc. Upper 700 MHz Guard Band Licenses and Revisions to Part 27 of the Commission's Rules	)	
	)	PS Docket No. 06-229
Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band	)	WT Docket No. 96-86
	)	
Development of Operational, Technical and Spectrum Requirements for Meeting Federal, State and Local Public Safety Communications Requirements Through the Year 2010	)	

COMMENTS OF SNOHOMISH COUNTY EMERGENCY RADIO SYSTEM

Snohomish County Emergency Radio System hereby submits these reply comments in response to the Commission's *Further Notice of Proposed Rulemaking* in the above-captioned proceedings.

Executive Summary

The Snohomish County Emergency Radio System (SERS) is a consortium of ten local governments within Snohomish County, Washington that have established a locally-funded, completely interoperable, 800 MHz trunked regional voice radio system serving all public safety agencies within the county. This system is linked to neighboring public safety radio systems and currently supports over 2000 individual first responder radios. SERS is embarking on the development of a county-wide 700 MHz wideband wireless data network, with the goal of delivering high performance wireless data services, precisely tailored to the needs of our first-responder users.

Snohomish County is concerned by many of the proposed changes to the current public safety band plan at 700 MHz present in the FCC Report and Order and Further Notice of Proposed Rulemaking, FCC 07-72. Our review of this Rulemaking leads us to believe that the recent FNPRM will not provide enhanced wireless data communications for public safety. The suggested change in moving dedicated public safety spectrum from local control and placing that valuable resource in the hands of commercial wireless service providers is ill advised.

Background

Snohomish County is located in northwest Washington State, between the waters of Puget Sound and the peaks of the Cascade Mountains. The south border of the county is 15 miles north of Seattle and the north border is 100 miles south of Vancouver, BC.

Over 2,000 square miles in size, Snohomish County's topography ranges from saltwater beaches, rolling hills and river bottom farmlands in the west to dense forest and alpine wilderness in the Cascade Mountains to the east. Sixty-eight percent of the county is forest land, 19% is rural, 8% is urban/city and 5% is agricultural (1993 figures).

Our fast growing county is the third most populous in Washington State, with the population at 618,600 as of 2001. Between 1990 and 2000, Snohomish County's population grew by about 30%. The population forecast for Snohomish County is for continued strong population growth, with 706,959 residents forecast for 2010.

Comments

Snohomish County is concerned that the proposed changes in the FCC Report and Order and Further Notice of Proposed Rulemaking, FCC 07-72 have a direct, negative impact on short and medium term opportunities for deploying wireless data systems that will support Snohomish County first responders.

Our mix of urban and rural areas, including very rugged mountain valleys and difficult coastal terrain, argue in favor of moderate rate wireless data systems that can be deployed to fit our local environment. Commercial wireless systems have historically been unable and unwilling to meet our technical requirements for coverage, capacity and reliability. We respectfully suggest that the Commission reconsider the concept of taking the very limited public safety wireless data spectrum resource available in this region (where half of the available spectrum is already shared with Canada) and

transferring it to use in a commercial system.

Further, Snohomish County believes that the current public safety 700 MHz allocations for voice and wideband data channels is inadequate, especially for the development of truly powerful, regional radio systems supporting voice and data. It is our belief that an additional allocation of currently un-auctioned 700 MHz spectrum is needed to add considerable broadband capability for public safety. We see such an addition of dedicated public safety spectrum, from the spectrum identified for commercial auction, as critical and fully consistent with wise management of the spectrum resource.

We recognize that the time to address this reallocation of spectrum slated for auction is limited and may require Congressional intervention. Our region will be working with national public safety organizations and others to review how to best support reassignment of spectrum for auction to public safety. We view this as a once-in-a-lifetime opportunity to truly meet the long term needs of government and public safety communications.

Conclusion

We view the further depletion of this resource by quasi-commercial services as undesirable and ask that the actions contemplated in the instant proceeding be reconsidered. This depletion of dedicated public safety spectrum creates real risk that first responders in our county will not have access to the critically important communications tools that this spectrum can support.

Finally, we caution that our citizens live and work entirely within the US-Canada border region. Historical lack of engagement on these coordination issues has been a significant problem with the international border areas with the "rebanding" of 800 MHz public safety spectrum. We strongly encourage discussion of any proposed changes with representatives of Industry Canada at the earliest opportunity.

Respectfully submitted,

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Chair of the Snohomish County Public Safety Wireless Data Committee

Date: May 23, 2007