

**COMMENTS PERTAINING TO FCC NPRO
WP DOCKET NO. 07-100**

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I am offering comments pertaining to the WP Docket No. 07-100. I apologize in advance for any information that may already be covered elsewhere, mentioned in other sections and anything that might contradict any existing laws, rules or regulations already in place.

Section A 4

This section discusses Coordination, Paging on on Public Safety VHF Frequencies, Cross-Banding, Mobile Repeaters, Expired Licensing and Multiple Licensing. I will comment on paging only.

(Parts 4, 5 & 6)

I will assume the term “Paging” means any form (data, two-tone, DTMF, etc) in which to alert receivers to information in a one-way or semi one-way setting (i.e. Alpha paging a doctor, tone alerting volunteer firefighters, etc).

This particular means of which to alert and provide information is used widely in the United States and may be the most used form of alerting nationwide. VHF High-Band is also the most common band used by public safety in the US, with no real plans for all the users to change bands. Here in New Hampshire, more than 90% of public safety and government communications is located on VHF High-Band. After a recent grant providing thousands of VHF High-Band mobiles, portables, and base station equipment to public safety agencies, New Hampshire isn't likely to consider change for decades. I say this because just about all of the Fire and EMS agencies utilize paging to alert their members (paid or volunteer) of incidents. Therefore, an all-out elimination of paging would cause irreparable damage to New Hampshire's public safety communications infrastructure.

However, it is understandable that many frequencies have had paging operations conducted in an inappropriate manner, interfering with two-way communications. This matter also highlights a larger problem of allowing local community or dispatch activity on designated Mutual Aid or Interagency/Interoperable frequencies.

Recommendations:

I would like to recommend not a broad elimination of paging, but restrictions on specific frequencies (listed below) to eliminate paging, and even primary dispatch operations for interagency or mutual aid frequencies.

1) The frequencies recommended for restriction would be...

151.1375*
154.2650
154.2725
154.2800
154.2875
154.2950
154.3025
154.4525*
155.1600**
155.3250
155.3325
155.3400
155.3475
155.3550
155.3625
155.3850
155.3925
155.4000
155.4075
155.4750
155.4825
155.7525*
158.7375*
159.4725*

2) Paging should be used exclusively and only in an interoperability, interagency and/or Mutual Aid Capacity. This would include dispatch centers alerting each other to come up on the frequency for mutual aid purposes. Local member and/or apparatus paging should not be allowed on these frequencies.

3) Protection is needed to avoid the restricted operations for the reasons the FCC designated these frequencies. These frequencies were designated for interoperability, mutual aid and interagency operations. Local dispatching, employee paging, and similar functions do not meet the criteria. Since these frequencies were designated on a national level, the need to protect them for interoperability is paramount to maintain their designation nationally and even locally. For example, New Hampshire has begun designating the Fire Mutual Aid frequencies for interagency operations. However, Dover, NH,

York, Maine, Wilmington, Mass and the New Hampshire Fire Academy all use some of these frequencies for their local dispatch operations, hampering the ability to use them for mutual aid.

4) Grandfathering is a tricky situation as I'm sure you're well aware. If the federal government dictates a change, there is an expectation that the "Feds" will financially, and through other means, address the issue. Especially since that community may not have asked for the frequency and the Coordinators inappropriately allowed it. Certain frequencies however, must be cleared and all should have some regulation requiring them to vacate the affected frequencies and/or reassign their use more appropriately.

I would recommend on 155.340, any paging that affects an Ambulance-to-Hospital patch type system cease immediately. Any use of 155.7525 (Nationwide Calling) should also cease immediately to allow the channel to remain free for calling.

I would recommend a 5 year grace period to allow users conducting local operations on designated frequencies to begin licensing separate frequencies and/or utilize other existing licensed frequencies for local operations. Because this would be a requirement, I'd recommend a price discount to assist.

The 5 year grace period would allow agencies to research and put aside funds for licensing and programming.

Below is a few additional recommendations for some of the designated frequencies...

* The nationwide "V-Tac" frequencies to have an assigned PL/CTCSS tone of 156.7 similar to how the 800Mhz similar frequencies have been designated.

** 155.160 to be designated officially as the Nationwide Search & Rescue frequencies (include local, county, state Urban Search & Rescue) and determine a recommended CTCSS/PL tone.

Thank you for allowing public comment on these matters. As an end user of such systems, it is appreciated to be allowed to provide recommendations and comments.

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