

*Region 20 – 700 MHz Regional Planning Committee*  
*District of Columbia, State of Maryland and Northern Virginia*

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February 25, 2008

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

Attention: Chief, Public Safety and Homeland Security Bureau

Dear Chief Poarch:

As Chairman of Regional Planning Committee 20 (Region 20), I am writing to you regarding the Special Temporary Authorization (STA) Order issued by the Commission for the District of Columbia Government – Office of the Chief Technology Office (DC)<sup>1</sup>. In ¶5 of the Order, the Commission notes “DC submits letters of support from the Regional Planning Committees of the four adjacent regions – Regions 28, 36, 42, and 44 – as well as its own region, Region 20”. In this letter, I speak only for Region 20.

In the original Order of the Commission<sup>2</sup> authorizing the establishment of a regional wireless broadband network operating in the 700 MHz band, the support of Region 20 was noted in ¶14. However, it is important to note that the original support of Region 20 was offered prior to the Commission’s Second Report and Order<sup>3</sup> that instituted a new band plan for 700 MHz in ¶325 as well as a single nationwide public safety broadband licensee in ¶369.

For the record, Region 20 desires to amend its statement of support for the DC 700 MHz broadband network from that properly articulated by the Commission in DA 07-454 under circumstances that have changed since the release of DA 07-454. In the original Plan for 700 MHz, Region 20 cooperated with DC and identified a sufficient number of “wideband channels” to support the development of an experimental broadband network operating within the National Capital Region (NCR) pursuant to the Commission’s authorization. To support the NCR, the Region originally had requested in the then draft 700 MHz Plan a Commission waiver of the wideband channel aggregation limitations to accommodate the DC network. The Region and DC had agreed that DC would apply for wideband/broadband channels to support its network upon acceptance of the Region 20 Plan and opening of Window 1. This potential waiver request was deleted from the submitted Region 20 Plan<sup>4</sup> after the Commission issued DA 07-454.

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<sup>1</sup> DA 07-4850 Released November 29, 2007

<sup>2</sup> DA 07-454 Released January 31, 2007

<sup>3</sup> DA 07-132 Released August 10, 2007

<sup>4</sup> Region 20 700 MHz Plan submitted June 27, 2007

In DA 07-4850, the Commission authorized continued operation of the DC wireless broadband network using 770.625-771.875 MHz and 800.625-801.875 MHz. However, the Commission adopted a new band plan for 700 MHz in the Second Report and Order,<sup>5</sup> and the channels incorporated within the current DC STA are located in the newly defined band segment supporting 700 MHz narrowband voice channels.

Region 20 has a number of potential applicants for narrowband voice channels in 700 MHz. Accordingly, Region 20 took every action to expedite compliance with ¶345 of the Second Report and Order<sup>6</sup> and resubmitted the 700 MHz Plan on December 31, 2007. Accordingly, Region 20 wishes to amend its earlier support for DC so the record reflects that Region 20's continued support is predicated on DC rebanding the experimental wireless broadband network from the frequencies authorized in the STA as well as any other frequency in the 769-775 and 799-805 MHz segment of the band to other spectrum as permitted by the Commission prior to February 17, 2009.

Region 20 has discussed this concern with DC and has been assured by Mr. Kenneth Boley, Deputy Director for the Office of Chief Technology Officer for the District of Columbia, that in future STA applications for extension, that the DC 700 MHz wireless broadband network will be rebanded from the currently authorized frequencies to some other frequencies outside of 769-775 and 799-805 MHz band segments prior to February 17, 2009. Region 20 supports the DC frequency change and continued operation of the DC wireless broadband network until it is incorporated into the system of the Public Safety Spectrum Trustee Corporation's<sup>7</sup> network at some point in the future.

Respectfully submitted,

/s/ *G. Edward Ryan, III*

Chairman  
Regional Planning Committee 20

Copy: Mr. Jeffrey Cohen  
Mr. Kenneth Boley  
Mr. Richard Reynolds, Chairman of Region 28  
Mr. Richard Matason, Convener of Region 36  
Mr. Robert DeLauney, Chairman of Region 42 (700 MHz)  
Mr. David Saffel, Chairman of Region 44

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<sup>5</sup> DA 07-132 Released August 10, 2007

<sup>6</sup> Ibid

<sup>7</sup> DA 07-199 Released November 19, 2007