

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington D.C., 20554

In the Matter of)
)
Petition for Rulemaking to Amend the)
Band Plan for the 764-776 MHz and) RM-11433
794-806 MHz Public Safety Bands)

**COMMENTS OF MOTOROLA, INC.
IN SUPPORT OF PETITION FOR RULEMAKING**

Motorola, Inc. (“Motorola”) submits these comments in response to the Petition for Rulemaking (“Petition”) filed by the National Public Safety Telecommunications Council (“NPSTC”).¹ NPSTC offers several recommendations for rule modifications that would affect the narrowband portion of the public safety 700 MHz allocation that, if adopted, will result in increased clarity and flexibility for licensees. Motorola urges the Commission to expeditiously issue a notice of proposed rulemaking that addresses the issues raised in the NPSTC Petition in a manner consistent with the additional suggestions provided herein.

In summary, the NPSTC Petition proposes the following modifications to the FCC’s rules and policies affecting public safety’s use of the 700 MHz band for narrowband voice and data communications:²

- ***Establish a single national interoperability calling channel.*** NPSTC states that one of the two sets of frequencies designated as a national interoperability calling channel is no longer needed and recommends that it be redesignated as a “Nationwide Interoperability Travel Channel” used for coordinating the

¹ Petition for Rulemaking of the National Public Safety Telecommunications Council, RM-11433, Feb. 8, 2008. *See also*, Public Notice, DA 08-1422 (June 16, 2008).

² Petition at 5-11.

movement of out-of-area resources and assets brought in to support wide-scale response incidents.

- ***Relax Use Restrictions on Narrowband Data Interoperability Channels.*** NPSTC recommends that the FCC should allow secondary tactical voice communications on one set of channels currently designated for nationwide narrowband data interoperability.
- ***Designate Reserved Channels for Deployable Trunked Systems.*** NPSTC proposes that the Commission should designate twenty four of the reserved narrowband channels for the deployment of mobile trunked infrastructure that can be transported into areas where existing infrastructure is either overloaded, devastated, or never existed. Under NPSTC's proposal, rapidly deployable infrastructure equipment would be required to comply with ANSI/TIA-102 (Project 25) standards and mobile and portable units would be licensed by rule.
- ***Revised Rules for Low Power Itinerant Interoperability Channels.*** NPSTC recommend that the FCC allow mobile and portable devices designed to operate on low power itinerant channels to utilize analog emissions with up to 20 watts ERP to enhance intelligibility and building penetration at emergency incidents.

The issues raised by NPSTC clearly warrant FCC consideration and should be addressed in a rulemaking proceeding as soon as possible. By the time the comment cycle for the NPSTC Petition has expired, there will be approximately six months until television broadcast facilities are required to vacate the 700 MHz band and the 700 MHz public safety narrowband spectrum becomes available for nationwide use. Licensees would benefit from these proposed rule changes that will enhance user flexibility.

Motorola supports the NPSTC proposals for redesignating one of the existing national calling channels and for permitting secondary use of narrowband data interoperability channels and recommends that the Commission include these proposals in a notice of proposed rulemaking. Motorola also supports the proposal to designate narrowband reserve channels for rapidly deployable infrastructure but agrees with

NPSTC that the coordination of such deployments presents challenges.³ To this end, the Commission's notice of proposed rulemaking should seek specific comment on how to ensure that these temporary facilities adequately protect co-channel and adjacent channel incumbents.

In addition, the Commission should consider other uses that need to be accommodated. Recently, in comments filed in WT Docket No. 06-150 addressing the 700 MHz D-Block spectrum, NPSTC noted the popularity of vehicular repeaters in the 700 MHz band and stated that “[d]esignating specific channels for vehicular repeaters so that the design can be more standardized may reduce costs.”⁴ NPSTC recommended that the upper 250 kHz of the guard band⁵ between the narrowband and broadband public safety spectrum at 768.750-769.000/798.750-799.000 MHz, (*i.e.*, twenty 12.5 kHz channels pairs) be designated for use by vehicular repeaters with licensees required to coordinate such use with the Public Safety Broadband Licensee.⁶ Motorola agrees with this recommendation as it will improve coordinated use of vehicular repeaters and provide for more effective spectrum utilization.

Motorola recommends that the Commission act on NPSTC's recommendation and designate channels from the guard band for low power vehicular repeaters in any forthcoming order to be issued in WT Docket No. 06-150 so that the delivery of this spectrum to public safety may be expedited. However, if that is not feasible, the need for additional low power 700 MHz channels for vehicular repeaters should be included in a

³ Petition at 9.

⁴ Comments of NPSTC, WT Docket No. 06-150, (June 20, 2008) at 25.

⁵ See 47 C.F.R. § 90.531(f).

⁶ *Id.*

forthcoming notice of proposed rulemaking in response to the NPSTC Petition and these comments.

As for the proposals to increase power on the itinerant use channels, Motorola agrees that additional power would be beneficial with some caveats. On those itinerant channels that are subject to regional planning,⁷ Motorola supports an ERP limit of 20 watts for mobile devices but would recommend a rule to limit antenna height “AGL” to 20 feet as is done in the UHF channels available for low power use.⁸ On the channels available nationwide for low power itinerant use,⁹ Motorola questions whether an increase to 20 watts is ERP is appropriate as there is a higher potential for interference between uncoordinated 20 watt ERP operations. This issue should be further explored in the rulemaking proceeding to ensure the best balance between obtaining coverage for itinerant uses and minimizing interference.

In addition to increasing the ERP of low power devices, Motorola requests that the Commission also seek comment on a proposal to increase the transmitter output power for mobile/portable devices designed to operate on the low power channels from 2 watts to 3 watts.¹⁰ This modest increase in power output should improve in-building performance and, also, improve economies of scale for the manufacturing of all 700 MHz

⁷ 47 C.F.R. § 90.531(b)(3).

⁸ 47 C.F.R. § 90.267.

⁹ 47 C.F.R. §90.531(b)(4).

¹⁰ Sections 90.531 (b)(3) and (b)(4) limit transmit output power on the low power channels to 2 watts. Section 90.541, however, generally allows mobile and portable radios to operate with up to 3 watts transmitter output power on all other 700 MHz channels.

mobile and portable devices. Any ERP and AGL limitations for the low power channels adopted in this proceeding would continue to apply.

For the reasons discussed above, Motorola urges the Commission to act expeditiously on the petition for rulemaking filed by NPSTC to enhance and clarify the rules applicable to the 700 MHz public safety spectrum reserved for narrowband applications.

Respectfully Submitted,

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