

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

In the Matter of)	
)	
Petition for Rulemaking to Amend)	RM-11527
The Land Mobile-TV Sharing Rules)	
On the 470-512 MHz Bands)	

COMMENTS OF THE LOS ANGELES COUNTY SHERIFF’S DEPARTMENT

The Los Angeles County Sheriff’s Department (“the Department”) hereby submits the following comments in support of the above-captioned Petition for Rulemaking submitted by the National Public Safety Telecommunications Council (“NPSTC Petition”) concerning the 470-512 MHz band. (TV channels 14-20).

Three of the television channels in the 470-512 MHz band (14, 16, and 20) are allocated for land mobile communications in the Los Angeles area, one of which (channel 16) is allocated exclusively for public safety.¹ The Los Angeles County Sheriff’s Department, the Los Angeles County Fire Department, and many other public safety agencies in the Los Angeles area depend upon those channels for most of their mobile and portable emergency communications. Recently, the Commission also granted a waiver to permit Los Angeles County to use channel 15 as part of a new interoperable radio network that will consolidate public safety operations for agencies and jurisdictions across the Los Angeles area.²

Los Angeles County covers an area of 4,084 square miles of extraordinarily diverse geography, including the densely populated Los Angeles Basin, off-shore islands, 11,000 foot

¹ 47 C.F.R. §90.303.

² *County of Los Angeles, California*, DA 08-2823, released December 30, 2008.

mountain peaks, remote valleys, and deserts. The region is also particularly susceptible to wildfires, mud-slides, and earthquakes. All of these factors make it extremely important that the County and surrounding jurisdictions have robust, ubiquitous, highly reliable, and interoperable public safety radio communications.

The 470-512 MHz band is likely to remain the principal public safety radio frequency band in the Los Angeles area for many years.³ Therefore, it is critical that public safety systems in the band be allowed to operate to the maximum extent possible without causing interference to television stations entitled to interference protection under FCC rules. The transition to digital television provides an excellent opportunity to update those rules as digital television transmission is less susceptible to interference than analog transmissions.

One of the most important changes proposed by NPSTC is to expand the area in which land mobile radio stations can be located to 80 miles from the center of the relevant metropolitan area. Pursuant to long-standing waiver, the County already operates some facilities beyond the current 50-mile area to provide coverage over certain outer portions of the County's jurisdiction. That and other rule changes proposed in the NPSTC petition would allow the County and other licensees greater flexibility in their system design and operation to maximize public safety radio communications.

The Department also recommends that the Commission consider modifying Section 90.303 to change the geographic center listed for Los Angeles. The geographic center specified in the rule is at Los Angeles City Hall. However, because of the size and shape of Los Angeles County, the current 50-mile radius excludes portions of the County's jurisdiction north of the San Gabriel Mountains. A far more "central" location for the Los Angeles urbanized area

³ As noted in the Commission recent grant of its waiver to use channel 15, the 470-512 MHz band has long been recognized as the primary public safety band in the area.

would be atop Verdugo Peak (34° 13' 03"N, 118° 16' 56"W). This change would also be consistent with the mobile radio licenses granted to the County for channel 15, which specifies that mobiles may be used within a specified radius of Verdugo Peak. Attached hereto are maps depicting the current 50-mile radius and proposed 80-mile radius from both the current and proposed geographic centers.

CONCLUSION

Therefore, for the reasons set forth above, the Department urges the Commission to initiate a rulemaking proceeding to implement the rule modifications proposed above and in the NPSTC Petition.

Respectfully submitted,

/s/

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