

**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  
CONNECTICUT REGIONAL EMERGENCY COMMUNICATIONS CENTERS  
ASSOCIATION**

The Connecticut Regional Emergency Communications Centers Association (RECCA) pursuant to Section 1.415 of the Commission’s Rules, 47 C.F.R. § 1.1415, hereby respectfully submits its Comments in the above-captioned proceeding.

RECCA is an association of the seven Regional Emergency Communications Centers of Connecticut. The member organizations of RECCA provide “911” call receipt and emergency dispatching services to eighty-one political subdivisions, including seventy-five of Connecticut’s one hundred sixty nine towns, comprising an aggregate population of 493,672 residents.

RECCA strongly supports the petition of the National Public Safety Telecommunications Council (NPSTC) and urges adoption of NPSTC’s recommendations included therein as further modified to include the suggestions of RadioSoft filed in this proceeding. In particular RECCA strongly urges the Commission to add Hartford, Connecticut to the list of markets where uhf T-Band frequencies may be used by public safety entities without interfering with TV emissions or reception. Connecticut has suffered for decades with a lack of spectrum for important public safety communications and the NPSTC proposal offers the possibility of providing needed communications channels for the benefit of the public. Because of the paucity of available frequencies, RECCA recommends that this additional spectrum be made available exclusively to new public safety licensees. Since

multiple channels are often needed to operate simultaneously at major emergencies, RECCA also recommends that qualified prospective licensees be allowed to license several channels even if they are not all saturated, as is allowed in the 450-470 Mhz band.

RECCA supports NPSTC's recommendation that handheld radios be authorized a maximum output of 5w in this band, and also supports the suggested extension of the allowable range from 80 to 128km from the metropolitan center.

RadioSoft recommends that LMR users in this band be protected from interference by existing or newly authorized low power TV stations or translators. RECCA concurs in this recommendation.

In conclusion, RECCA urges the Commission to file a Notice of Proposed Rulemaking addressing the modifications to the 470-512MHz band recommended herein and to act on that NPRM in an expedited manner. The additional spectrum that would be made available to public safety users is needed immediately and any delays in authorizing its use should be minimized.

Respectfully submitted,

**CONNECTICUT REGIONAL EMERGENCY COMMUNICATIONS CENTERS  
ASSOCIATION**

BY: \_\_\_\_\_/s/\_\_\_\_\_

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