

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

In the Matter of	)	PS Docket 06-229
The Region 33 (Ohio)	)	
700 MHz. Plan	)	WT Docket 02-378
	)	

To: The Commission

**Comments of the State of Ohio, Multi-Agency  
Radio Communications System (MARCS)**

The State of Ohio (Ohio) currently operates a trunked 800 MHz. radio system <sup>1</sup> providing routine and emergency voice and data communication services to more than 700 first responder and public safety – public service agencies who operate over 33,000 subscriber units statewide. These agencies consist of all level of government; from state, county, municipal and township, all Sheriffs, all county Emergency Management Agencies, all hospitals and health departments as well as private and or quasi-governmental agencies, such as medical helicopter services and the Ohio Rural Electric Cooperative, consisting of 25 different electric co-ops serving more than 380,000 homes and businesses in 77 of Ohio's 88 counties.

Ohio has worked diligently with the Region 33 700 MHz. Planning Committee since it was organized February 28, 2001 to promote additional interoperable communication spectrum for public safety / service entities and continues in this endeavor.

In our several highly urbanized areas, like Cleveland-Cuyahoga County, Akron-Canton, Columbus, Dayton and Hamilton County-Cincinnati, the proliferation of 800 MHz. systems has greatly increased public safety communications interoperability but has all but exhausted the available spectrum.

In conjunction with the Cuyahoga County Commissioners and many of the 59 cities, villages and townships in the county, MARCS is preparing to roll out a 14 site 15 channel trunked radio system, as the first step toward countywide communications and to aid their first responders with communications interoperability, a feature they have never had before. However; with the available 800 MHz. spectrum exhausted in the area, this roll-out is totally dependant on the 700 MHz. spectrum, as soon as it becomes available.

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<sup>1</sup> known as MARCS, the Multi-Agency Radio Communications System

Ohio is also looking forward to additional spectrum for broadband data communication to replace and improve our existing RD-LAP network. While workable for existing state users, we have had to severely restrict its expansion to the local government community due to the lack of spectrum available. We hope the Commission will act swiftly to either proceed with the nationwide program with the Public Safety Spectrum Trust (PSST) or release the spectrum back to the Regions so they may oversee and promote the construction and / or expansion of broadband data solutions to increase the interoperability capability of public safety entities at all levels of response.

### CONCLUSION

Ohio badly needs the spectrum which will be available when the Region 33 plan is approved and released. We will make all haste to construct the Cuyahoga County system and promote greater public safety interoperability throughout the state, at all levels of government. This, we feel, is clearly in the public interest and will further the Homeland Security mission the State is charged with.

Ohio sincerely hopes the Commission will look favorably on the Region 33 Plan, fully approve it and release the spectrum as soon as possible.

Respectfully,



Darryl L. Anderson, Director  
State of Ohio MARCS Program

June 1, 2009