



# CITY OF HOUSTON

Mayor's Office of Public Safety and Homeland Security

**Annise D. Parker**

Mayor

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July 22, 2010

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street S.W.  
Washington, D.C. 20554

Re PS Docket 06-229  
WT Docket 06-150

Dear Ms. Dortch:

Recently in several national forums, members of the commission and others have expressed concerns regarding the use of the 700 MHz frequency band for narrowband voice and had indicated a need to explore the possibility of using these frequencies for broadband in the future. As the Director of the Mayor's Office of Public Safety and Homeland Security, I would like to share with you the critical importance of both the 700 MHz narrowband and broadband frequency blocks for the be first responders of our City.

Several years ago, the City of Houston began a major program to upgrade the public safety communications systems from the outdated technology systems used by law enforcement and Fire/EMS for many years, to a new standards-based, digital trunked radio system at a cost of over \$125 million. This is by far the largest Information Technology project ever undertaken by the City of Houston. The new system will provide interoperability with our neighboring first responder partners and with other State and Federal responders. At the inception of our efforts, it became clear that as in most major metropolitan areas, the available spectrum for a new system was insufficient in the UHF and 800 MHz frequency bands. In fact, there is not even enough available spectrum in the narrowband 700 MHz spectrum. To construct a system that will meet the needs of the City of Houston first responders, we will be using ALL available 700 MHz frequencies allotted to local government users as well as the vast majority of 700 MHz frequencies allocated to the State of Texas. Without the 700MHz frequency band, the City would not be able to construct a modern, interoperable, public safety radio system.

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The City also owns an antiquated data system that provides narrowband, textual data to our first responders in the field. This system is nearing end of life and needs to be replaced. However, our new computer technology needs larger bandwidths to function properly. These larger bandwidths can't be accomplished without broadband spectrum. We have a large public safety video project that would be an ideal candidate for our "office in the patrol car" concept but we fear there will also be insufficient bandwidth available for this potentially vital tool. The City of Houston first responders and the citizens they serve and protect need the broadband spectrum from both the current 700 MHz public safety broadband allocation as well as the "D Block" spectrum that is set to be auctioned. New York and other large metropolitan areas have already expressed this need along with data to amplify their request. We would like to add our plea to theirs – We NEED the "D Block!"

The City is keenly aware of the difficult position of the Commission in balancing the needs of consumers versus the needs of public safety. We strongly believe that meeting the needs of public safety should come first. After all, is streaming television to smart phones more important than public safety?

In summary, the City absolutely requires the 700 MHz narrowband spectrum to support our voice system deployment. We also consider 700 MHz broadband spectrum (including the D Block) to be of vital importance to our mission.

On behalf of our first responders, we hope you find this information helpful as the Commission considers the important issues of spectrum management. Should you have any questions, or require additional information, please contact Tom Sorley, Deputy Director Radio Communication Services at 832-393-0300.

Sincerely,

  
Dennis Storemski

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cc: The Honorable Anise Parker, Mayor, City of Houston, Texas  
The Honorable Rick Perry, Governor, State of Texas  
The Honorable Kay Bailey Hutchison, United States Senator, Texas  
The Honorable John Cornyn, United States Senator, Texas  
The Honorable Sheila Jackson-Lee, Congresswoman, United States Congress  
The Honorable John Culberson, Congressman, United States Congress  
The Honorable Al Green, Congressman, United States Congress  
The Honorable Raymond Green, Congressman, United States Congress  
The Honorable Michael McCaul, Congressman, United States Congress  
The Honorable Julius Genachowski, Chairman, Federal Communications  
Commission  
The Honorable Robert M. McDowell, Commissioner, Federal Communications  
Commission  
The Honorable Michael J. Copps, Commissioner, Federal Communications  
Commission  
The Honorable Mignon Clyburn, Commissioner, Federal Communications  
Commission  
The Honorable Meredith Attwell Baker, Commissioner, Federal  
Communications Commission