



Region 12, Idaho, 700 MHz Regional Planning Committee

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Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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RE: Docket 06-229

Dear FCC,

The Region 12, 700 MHz Regional Planning Committee would like to oppose the flexible use of 700 MHz public safety narrowband spectrum and the adjacent guard band spectrum for the use of broadband.

Region 12 has the distinction of having the second 700 MHz public safety radio system in the nation. The first sites in this system began in Ada County, Bannock County, and Bingham County, Idaho in June of 2006. Since then twenty nine sites have been added to the system which spans the entire state, serving over 13,000 subscriber units.

Region 12 is strongly opposed to changing the current narrowband public safety spectrum to allow broadband use. This opposition is directly related to the fact that in 2008, the FCC allowed rebanding of the 700 MHz spectrum which greatly impacted the Ada, Bannock, Bingham County radio systems. These systems were licensed under the old 700 MHz bandplan and were subsequently forced to reband to the current plan. This rebanding caused both of these agencies financial and operational hardships as they were forced to spend hundreds of thousands of dollars to reprogram & re-license their radio systems and thousands of subscribers.

Region 12 does not want to have a repeat of that disaster. We fear that the mixed use of narrowband and broadband channels will ultimately mean we could lose upwards of 400 narrowband channel pairs. This would leave us only 25% capacity for voice use in the narrowband spectrum. This minimized capacity would be devastating to our statewide radio system and to our Public Safety users. Region 12 has already had to re-do it's regional planning twice in the last five years at great expense and many thousands of man hours.

Please do not allow the flexible use of the 700 MHz public safety narrowband spectrum. Allow our stakeholders the ability to strictly use this spectrum for our critical voice communications which are absolutely essential for the safety of our public safety responders and the public they serve.

Sincerely,

Todd Herrera
Chair, Region 12, 700 MHz RPC