

Implementing a Nationwide ) PS Docket 06-229  
Broadband, Interoperable Public ) DA 10-1877  
Safety Network in the 700 MHz Band )

**Comments of  
The Region 7 (Colorado) 700 MHz Regional Planning Committee**

**December 3, 2010**

The REGION 7 (Colorado) 700 MHZ REGIONAL PLANNING COMMITTEE submits these comments in response to the September 28, 2010 Public Notice released by the Federal Communications Commission seeking comment on whether to permit flexible use of the 700 MHz narrowband spectrum for broadband use.

The REGION 7 (Colorado) 700 MHZ REGIONAL PLANNING COMMITTEE strongly opposes any further reorganization of the 700 MHz band for these main reasons: 1) there is a specific demand for narrowband 700 MHz spectrum for the expansion of mission critical voice systems, and, 2) With thirty- five 700 MHz Regional Plans approved, four completed 700 MHz Plans pending at the FCC and several Region-approved plans in the adjacent regions concurrence phase, the contemplated Commission action would require those plans to be re-written – some for a second/third time.

The 700 MHz narrowband allocation needs to remain narrowband without flexible option for broadband operations into the narrowband spectrum. The 700 MHz band became fully available in the major metropolitan areas and state licenses only about a year ago. Since that time, numerous Regional Plans have been approved and agencies are filing applications to deploy 700 MHz narrowband networks including many in Colorado.

Since their 700 MHz Plans were approved, agencies in Colorado and most surrounding states, have begun filing applications and have been granted licenses for 700 MHz narrowband systems. Other Regions have several applications for narrowband systems still undergoing the regional review process. These applications demonstrate the genuine need for 700 MHz narrowband spectrum to satisfy a rising demand of, in some cases, over 10 years. The 800 MHz band has been unavailable in the major metropolitan areas for ten to fifteen years in some cases. The 700 MHz band is the only option agencies in densely populated cities and suburban areas have if they wish to deploy mission-critical voice systems.

Agencies that have begun planning for the deployment of 700 MHz narrowband systems need the support of the FCC in continuing to keep the 700 MHz narrowband in place for further expansion and compatibility with all State in the United States. Agencies need regulatory certainty in order to finalize their plans.

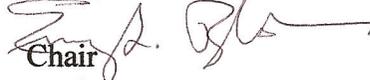
With the majority of the 700 MHz Regional Planning Committees (RPCs) having completed their 700 MHz Regional Plans at a cost of many hours of dedicated service by volunteers with full-time “regular” jobs, the FCC should not enact any regulations that would require these plans to be re-written, in most cases for a second time. Regional Plans filed or approved prior to the FCC’s 2007 band reorganization of the 700 MHz band already had to be re-written to match the new band plan resulting in licensing delays and expenditure of effort.

REGION 7 (Colorado) 700 MHZ REGIONAL PLANNING COMMITTEE expresses its support for the Comments submitted by Adams County (ADCOMM911), Colorado on this matter. The State of Colorado, ADCOMM911, and all local licensees need stability in their mission-critical communications system.

In summary, the REGION 7 (Colorado) 700 MHZ REGIONAL PLANNING COMMITTEE opposes the introduction of flexibility into the narrowband 700 MHz spectrum. It should and must be retained for mission-critical voice communications so that agencies throughout the nation have much-needed spectrum to expand existing or implement new systems.

Respectfully,

Emery L. Reynolds



Chair

Region 7 (Colorado)

700 MHz Regional Planning Committee