

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
Innovation in the Broadcast Television Bands:) ET Docket No. 10-235
Allocations, Channel Sharing and Improvements)
to VHF)

**COMMENTS OF THE
LOS ANGELES REGIONAL INTEROPERABLE COMMUNICATIONS SYSTEM**

The Los Angeles Regional Interoperable Communications System (“LA-RICS”) Authority hereby submits the following comments in response to the Commission’s *Notice of Proposed Rulemaking*, FCC 10-196, released November 30, 2010 (“*NPRM*”) in the above-captioned proceeding. The Commission is proposed changes to its table of allocations to accommodate the potential “repurposing” of television spectrum.

The LA-RICS project is a collaborative effort of law enforcement, fire service, and health service professionals with elected and appointed officials working towards the goal of providing a single, unified voice and data communication platform for all regional public safety agencies. A Joint Powers Authority (“JPA” or “Authority”) has been established for the LA-RICS project to engage in regional and cooperative planning and coordination of governmental services to establish this region-wide interoperable public safety communications network. When completed, LA-RICS will cover over 4000 miles of diverse terrain and serve over 34,000 first responders working across 80 separate local agencies. LA-RICS will incorporate both a land mobile radio (“LMR”) system and a wireless broadband data system. The LMR system is a P25 digital, trunked system. The data system will be built using long term evolution (“LTE”) wireless standards and utilize spectrum in the 700 MHz band. The new system will allow

interagency coordination and response to routine, emergency and catastrophic events.

The principal interest of LA-RICS in this proceeding is to remind the Commission of the critical public safety land mobile radio use of spectrum in the 470-512 MHz band (TV Channels 14-20). LA-RICS is currently deploying its interoperable voice radio network in that band, which is already the “home” for most public safety communications in the Los Angeles area. Therefore, under no circumstances should a “repurposing” of the television spectrum prevent the ongoing public safety use of the 470-512 MHz band.¹

The 470-512 MHz band (sometimes referred to in the land mobile community as the “T-band”) has long been allocated for both television and land mobile use in eleven major metropolitan areas. In Los Angeles, frequencies in TV channels 14, 15, 16, and 20 are allocated by rule² or waiver³ for land mobile use, with channels 15 and 16 set aside exclusively for public safety. Current public safety licenses on these channels, including recently assigned channel 15, will provide the core of the new LA-RICS interoperable voice communications network. Portions of the 470-512 MHz band are also allocated for public safety and other land mobile use in the New York, San Francisco, Philadelphia, Boston, Washington, Chicago, Miami, Pittsburgh, Dallas, and Houston metropolitan areas. Most 470-512 MHz radio equipment is interoperable with equipment used in the adjacent 450-470 MHz band, which is allocated nationwide for land mobile radio.

¹ LA-RICS strongly recommends that any Commission action consider the impact it would have to the Los Angeles region public safety operations. Over the years this region has suffered harmful interference various sources. The topography of the Los Angeles region requires the use of high-elevation radio sites. This allows reception of radio signals from far outside of the frequency-protected area. Any repurposing of the band can potentially create further harmful interference for this reason.

² 47. C.F.R. §90.311.

³ *County of Los Angeles*, California, DA 08-2823, released December 30, 2008.

LA-RICS is deploying its new network platform in the 470-512 MHz as most public safety agencies in the Los Angeles area already operate in the band, and because of the lack of alternatives in other portions of the radio spectrum. The 700 MHz narrowband spectrum allotments in Los Angeles are insufficient to meet LA-RICS requirements,⁴ and the ability of the future 700 MHz broadband network to deliver mission-critical voice communications (including unit-to-unit and one-to-many communications) will be unknown for many years.⁵ The 800 MHz band is unavailable as it is already fully assigned to other Southern California public safety agencies. In short, the 470-512 MHz band is essential to the future of interoperable police, fire, and other public safety communications in the Los Angeles area.

CONCLUSION

Therefore, for the reasons discussed above, the Commission must not take any action that would interfere with the long-term use of the 470-512 MHz band for public safety land mobile communications in Los Angeles and other major metropolitan areas.

Respectfully submitted,

LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM AUTHORITY

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⁴ *Id.*

⁵ LA-RICS has also received a “waiver” authorizing its deployment of a broadband data system in the 700 MHz spectrum licensed to the Public Safety Spectrum Trust.