

Please consider these comments in reference to:

PUBLIC SAFETY AND HOMELAND SECURITY BUREAU SEEKS COMMENT ON PETITION FOR DECLARATORY RULING ASKING TO CLARIFY THE SCOPE OF SECTION 337 REGARDING USE BY STATE OR LOCAL GOVERNMENT ENTITIES OF THE 700 MHZ PUBLIC SAFETY BROADBAND SPECTRUM. (DA No. 11-537). (Dkt No 06-229 ). Comments Due: 04/11/2011. Reply Comments Due: 04/21/2011.

The County of Berks, Pennsylvania supports the actions of the FCC in the dedication of spectrum to public safety operations. However, it is critical to note that a system providing true interoperability among disciplines must permit free access to governmental agencies engaged in public safety operations. It is unreasonable to expect that a jurisdiction would be able to deploy a modern trunked radio system for use solely by fire, law enforcement, and EMS, but maintain a second system for use by public works and general government.

Such a deployment would be costly, reduce interoperability necessary to respond to major emergencies, and defeat the objectives of the FCC and override the primary design feature of a trunked radio system, that being the efficient use of available spectrum within a system by maximizing the use of channels through minimization of idle time. Two systems would require more spectrum to meet peak demands, while causing more spectrum to sit idle during less busy times. Combining the total subscriber package onto one system permits that package to be served by fewer channels due to the exponential rise in the upper end of the channel/subscriber curve.

For these reasons, the County of Berks encourages the FCC, in making a clarification on the matter at hand, to permit the access of this spectrum by governmental departments/agencies and NGOs intending to operate on a trunked radio system primarily serving the jurisdictions fire, law enforcement, and EMS service(s).

Thank you for this opportunity to comment, and your consideration of same.