

Region 39, 700 MHz Regional Planning Committee
John Johnson, Chairman
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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

RM-11433

Petition for Rulemaking to allow
Aircraft voice operations on Secondary
Trunking Channels in the 700 MHz band

Comments from Region 39 Planning Committee

Summary Comments: The Commission should initiate a proceeding for rulemaking

Region 39 (Tennessee) 700 MHz Regional Planning Committee, files these comments on the FCC petition to Allow aircraft voice operations on the Secondary Trunking Channels in the 700 MHz band. The Commission should initiate a rulemaking proceeding to consider the NPSTC proposal as well as any other flexible, coordinated use of Narrowband Secondary Trunked 700 MHz Public Safety Channels. Their rulemaking should also request comments and consider similar use for Narrowband Reserve 700 MHz Public Safety Channels. In these times of dramatic technology advancements combined with a desire for greater public safety capabilities and performance, Region 39 feels that periodically revisiting rules and scope associated with existing public safety spectrum allocations, in this case the public safety 700 MHz band, offers the best opportunities for spectrum efficiencies and effectiveness.

As more agencies in Tennessee license and build 700 MHz systems and technology develops, we see the need to periodically revisit the rules and make them as spectrum efficient for the Public Safety community. Region 39 supports the NPSTC petition and flexible, regionally coordinated use of the 700 MHz narrowband allocation.

Region 39 supports the use of the designated Secondary Trunking Channels in the 700 MHz public safety band for aircraft operations as proposed in the NPSTC Petition for Rulemaking. Regional Planning Committees are familiar with how all types of 700 MHz spectrum is utilized within their region, above and beyond the General Use Channel allocation that they are responsible for coordinating for public safety use. The use of other categories of 700 MHz public safety spectrum such as Geographic State License Channels, dedicated Interoperability Spectrum and Reserve channels are specific to each community and region and that flexibility can be increased with rules that allow flexible use, coordinated within and between regions, of other narrowband 700 MHz assets that the current rules do not provide such flexibility.

We agree that Secondary Trunked Channels are more often than not “lightly used” throughout the country and that sharing arrangements between and within states for the use of these channels for this and other regionally coordinated applications are an appropriate method for ensuring their overall effectiveness. We urge the Commission to initiate a rulemaking proceeding on the NPSTC request. Region 39 feels that the concept of regional coordination of flexible public safety applications on the Secondary Trunked Channels can support their use in the secondary trunked mode up to 25 KHz, as needed, as well as their use in applications independent of trunked operations within a region, including applications such as those identified herein.

Region 39 also supports inter and intra-regional/state coordination techniques enabling disparate spectrum use of 700 MHz narrowband assets, whether on the Secondary Trunked, Reserve, Interoperability or State License Channels. Region 39 is unique in that eleven other Regions are within 70 miles of the Tennessee state border. Our geographic position makes it more difficult to coordinate spectrum and the need to inter & intra coordination is critical. Region 39 would also like a database to track where State Geographic License transmitters are located for better coordination. One solution might be a requirement to enter the data into CAPRAD.

Region 39 supports regional coordination of Secondary Trunked 700 MHz narrowband channels, as well as other 700 MHz channels outside the General Use category, for use within each region. Secondary Trunked Channels, along with Reserve channels, should be coordinated within each region to enable the applications necessary within that region. The use of these channels in a region needs to be published on the CAPRAD database for review by neighboring regions and states to ensure usage of the channels on an inter-regional basis remains effective. The nature of the applications that each of these channels are used for in each region will vary and the flexibility of channel usage will only work if the use in each region is

documented on CAPRAD. We look forward to working with the Commission to enable this type of effective, flexible use of these important spectrum allocations.

In summary, in addition to the aircraft use proposed by NPSTC in their Petition, Region 39 supports a coordinated, flexible approach to the use of Secondary Trunking Channels in each Region. While the use of such channels to support aircraft operations, secondary to the conventional primary interoperable use of channels adjacent to these as outlined in the Commission's rules is viable, we acknowledge that other applications in addition to aircraft operations may benefit from the same availability and use of these and other sparsely used 700 MHz public safety channels in the overall allocation (such as Narrowband Reserve Channels) for specific operations such as vehicular repeater operations (MO3).

700 MHz spectrum is utilized in vehicular repeater operations extensively throughout the Nation in many digital and analog wide area trunked systems in 700 MHz, 800 MHz, 450 MHz and 150 MHz. Some wide area systems today operating in the analog mode in the 800 MHz band want to utilize 700 MHz spectrum for MO3 operations but cannot utilize the 700 MHz State License and General Use spectrum for their operation as those allocations require digital emissions and the few 700 MHz channels that permit analog emissions are utilized for statewide purposes in their regional 700 MHz plan. The flexible use of 700 MHz Narrowband Secondary Trunked or Reserve Channels for this purpose with relaxed analog emissions, coordinated with surrounding states and regions and documented on the CAPRAD database, may be one of several flexible applications deserving consideration and one that would benefit from the Commission initiating a rulemaking proceeding on.

Region 39 looks forward to a continued dialogue with the commission, other regional planning committees and the public safety communications community on this critical topic.

Respectfully,



John W. Johnson, Chairperson

Region 39 Regional Planning Committee