

Department of Technology
Radio and Electronics Division
Chuck Parker, Chief



County Executive
Bradley J. Hudson
Chief Information Officer
Rami Zakaria

County of Sacramento

April 18, 2012

TO: FCC

FROM: Mike Newburn
Telecommunications Systems Manager

SUBJECT: In response to FCC Public Notice DA 12-555 released: April 6, 2012

PS Docket No. 12-94

The Sacramento Regional Radio Communications System (SRRCS) on behalf of the County of Sacramento, California and it participates.

The Sacramento Region supports the efforts of the San Francisco Bay Area Region and the additional 21 waiver recipients in their request to extend current rights to use 700 MHz spectrum on an interim basis as part of the transition of the 700 MHz spectrum license to FirstNet. The Sacramento Region supports and encourages local government agencies such as the BayRICs Authority in the Bay Area to work with their States to move forward with the development of Regional Wireless Broadband Networks (system) as this benefits the First Responders Network Authority (FirstNet).

H.R. 3630, Section 6302 (a) established a state and local grant program to assist them to “identify, plan, and implement the most efficient and effective way for such jurisdictions to utilize and integrate the infrastructure, equipment, and other architecture associated with the nationwide public safety broadband network to satisfy the wireless communications and data services needs of that jurisdiction, including with regards to coverage, siting, and other needs.”

The Sacramento Region expects that the outcomes of these planning grants will be two-fold. For those areas of the United States that have not moved forward with deployment, FirstNet will receive basic infrastructure and geographic information and need to create a plan for the deployment of a system using the Request for Proposal process. For those areas that are prepared to, in the process of, or have already deployed a system, FirstNet will receive information about a functional system and FirstNet only needs to identify if it conforms to the national standards. This reduces the amount of effort required by FirstNet and should be encouraged by the FCC.

In H.R. 3630, Section 6203 (c) (1) and (2), FirstNet is required to establish technical requirements and use the commercial standard Long Term Evolution (LTE). As a condition of

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a waiver, agencies or States are mandated to comply with this technology. It is with eyes wide open that any entity would move forward, knowing what the expectation is in advance. It would surprise most of us if an entity willing chose to follow another path.

There is no upside to halting the current deployments by Waiver Recipients and any such delays could possibly jeopardize grant monies being used to deploy these systems. The FCC should take every effort possible to encourage local government agencies and / or States to move forward with the design and implementation of Regional Wireless Broadband Networks compliant with the technologies to be identified by FirstNet, as this will only speed up the deployment of facilities which will support a "nation-wide, interoperable public safety broadband network" which is what FirstNet is chartered to do in Section 6202 (a).

Grant recipients of BTOP funding and other local, state and federal monies could miss project milestones and the costs associated with filing for grant extensions, provided the grant terms allow it. Those losses would far exceed any savings by stopping the deployments. Waiver Recipient contractual obligations with vendors may cause additional costs as well as local planning and permitting costs. It's not clear what additional costs the FCC or NTIA would save by delaying Waiver Recipients.

For these reasons the Sacramento Region urges the FCC to extend the spectrum rights currently held by the Bay Area Region and other waiver recipients, and allow current projects to precede, as part to the spectrum transition process.

Thank you,

A handwritten signature in blue ink, appearing to read 'Mike Newburn', is written over a light blue horizontal line.

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