

Charles V. Bryson

Subject: TIA Reply Comments - Maryland Air-to-Ground Petition for Waiver

From: Charles V. Bryson [<mailto:cbryson@rcc.com>]

Sent: Tuesday, May 08, 2012 8:45 PM

To: 'Brian Scarpelli'

Cc: 'Mark Uncapher'; 'Ray Lehr'; 'Speidel, Robert'

Subject: TIA Reply Comments - Maryland Air-to-Ground Petition for Waiver

Hi Brian:

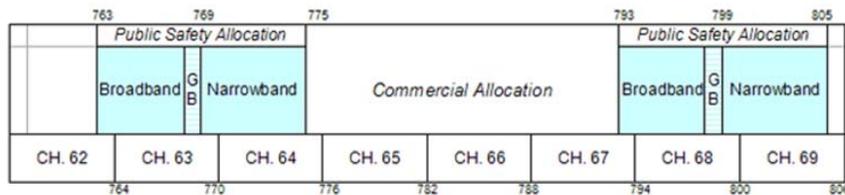
Thank you very much for the prompt follow-up to our call yesterday. Since you have TIA members seeking more information, I hope that what we offer below is helpful to their understanding of the Maryland Petition for Waiver.

From Maryland's perspective as well as that of the public safety communications community, the use of air to ground channels is very seriously needed and addressed specifically in the Petition to prevent unintended interference to distant 700 MHz stations operating on frequency some distance from an aircraft transmitting on state or general pool channels. We read the TIA filing in July carefully and tried to address the concerns in the Petition as well as Reply Comments. To that end, we coordinated 700 MHz use with Region 20 and proposed a very low power setting of only two watts ERP. If I read the TIA Reply Comments correctly, my sense is that the Association acknowledged that Maryland's Petition addressed the narrowband 700 MHz channels. However, there was some concern expressed regarding the broadband channels in the upper 700 MHz band; e.g. the Upper 700 MHz "C" and "D" blocks.

The "C" block, assigned to Verizon, operates on 747-758 MHz (fixed) and 777-788 MHz (mobile)

The "D" Block and public safety broadband, will operate on 758-768 MHz (fixed) and 788-798 MHz (mobile)

700 MHz Band Plan for Public Safety Services



The Commission inserted two guard bands in the spectrum plan to prevent interference between broadband and narrowband users (768-769 MHz and 798-799 MHz). Even beyond Maryland's compliance with all rules within Subpart R of Part 90 and our proposed power limitation of two watts ERP, there is over one megahertz between broadband and the first (current) secondary trunking channel. With respect to Verizon Wireless, there is over eleven megahertz of separation. From a practical operational standpoint, aircraft will be travelling at +/- 130 knots and even in the highly unlikely event that there was interference; it should be momentary as the goal of the EMS program is to speed critically injured patients to trauma facilities. EMS aircraft do not typically "loiter" in airspace but land, take-off, and transport patients to Trauma Centers.

We did specifically include in the Petition compliance with all Part 90 rules including Subpart 423(a)(3) which states that aircraft operation must be "secondary" meaning that we cannot render interference to a licensee and must accept it ("secondary" defined specifically in Subpart 90.7). Our understanding of the rules says that we

have to cease operation if the aircraft transmitter is interfering with a licensed user. With respect to public safety broadband, Maryland is also concerned with this important technology and we are just as interested as TIA in the prevention of any interference to public safety broadband communications.

Again, we are grateful for your help and look forward to crafting an appropriate strategy that permits us to go forward absent the 700 MHz radio interference that neither of us wants.

Best regards - Charley

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