



July 30, 2012

Federal Communications Commission
Public Safety and Homeland Security Bureau
445 12th Street, S.W.
Washington, D.C. 20554

Ref: PS Docket 06-229
Comments regarding the Request for Waiver of the December 31, 2016
700 MHz Narrowband Deadline by the State of Louisiana

Public Safety and Homeland Security Bureau:

The Regional Wireless Cooperative (RWC) representing its eighteen (18) member cities, towns and fire districts, submits the attached comments supporting the State of Louisiana's Expedited Action Request for waiver of the December 31, 2016 700 MHz narrowband deadline.

On February 21, 2012, the RWC filed a similar petition with the Public Safety and Homeland Security Bureau, requesting Expedited Review and Action. As you will see, the December 31, 2016 deadline for narrowbanding 700 MHz will have a significant impact upon the RWC as well as other similarly situated public safety communications systems in the State of Arizona and across the nation.

The members of the RWC fully support spectrum efficiency efforts on the part of the Federal Communications Commission, but in doing so, require additional time to plan and fund the narrowbanding conversion. The State of Louisiana's request for a delayed implementation deadline of 2024 is more than reasonable to achieve this goal.

Sincerely,

David A. Felix
Executive Director
Regional Wireless Cooperative

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION
PUBLIC SAFETY AND HOMELAND SECURITY BUREAU
WASHINGTON, D.C. 20554

PS Docket 06-229

In the Matter of:

Effect of FCC Rule 90.535d (2)(3) “*Modulation and spectrum efficiency requirements*” on the future efficiency, budgetary impact and sustained viability of the State of Louisiana and the Regional Wireless Cooperative (RWC).

The Regional Wireless Cooperative (RWC), representing its eighteen (18) members and supported by the Region 3 Regional Planning Committee representing the State of Arizona, submit these comments endorsing the State of Louisiana’s Expedited Review and Action for Rulemaking to the Commission’s Rules for its mandatory transition deadline to be waived or modified from December 31, 2016 to a date of December 31, 2020; or a yet to be determined date based upon certain criteria set forth by the Commission.

I. BACKGROUND

Similar to the State of Louisiana’s, Louisiana Wireless Information Network (LWIN), the RWC is diligently working with its regional public safety partners to promote interoperability between various public safety radio communications systems, to develop a system-of-systems approach to link systems together for improved interoperability and direct operability across a wide geographic area.

The RWC’s geographic footprint largely encompasses the Phoenix, Arizona metropolitan area with future connectivity to the major population centers of Tucson, Yuma and Flagstaff. An overview of the RWC is provided to frame and highlight the impact of the FCC’s 2017 deadline to narrowband 700 MHz on the LWIN, RWC, other similar regional communications systems, and their member agencies.

The RWC is a cooperative body formed under an Intergovernmental Agreement (IGA) whose purpose is to provide seamless, wide-area, operational and interoperational public safety communications through a governance structure founded on the principle of cooperation for the mutual benefit of all subscribers. Participation is open to all local, county, state, tribal and federal entities.

Governance oversight is managed by a Board of Directors consisting of one executive representative from each member. The Board directs the operation, maintenance, planning, design, implementation and financing of the RWC. Membership

includes the majority of cities, towns and fire districts in the Phoenix metropolitan area. Current membership, as of July 1, 2012, includes:

City of Avondale	City of Phoenix
Town of Buckeye	City of Peoria
City of Chandler	City of Scottsdale
Daisy Mountain Fire District	Sun City Fire District
City of El Mirage	Sun City West Fire District
City of Glendale	Sun Lakes Fire District
City of Goodyear	City of Surprise
Town of Guadalupe	City of Tempe
City of Maricopa	City of Tolleson

II. INFRASTRUCTURE

The RWC radio network is a large, public safety system based on the Project 25, Phase I Standard. The network is an ASTRO 25™, integrated voice and data, trunked radio system providing coverage over 11,000 square miles of central Arizona. It operates in the 700/800 MHz frequency bands and uses standard Simulcast, IP Simulcast, and individual site trunking. The network consists of seven (7) major simulcast subsystems and ten (10) Intelligent Site Repeaters (ISR's) with over 1000 transmitters and over 200 RF channels.

Over 18,200 member subscribers (radios) are currently supported on the network. Additionally, there are more than 40 non-member city, county, state, tribal and federal agencies on the network with over 14,000 radios that use the network as RWC "Interoperability Participants". The system provides seamless wide area coverage across central Arizona. The RWC is data capable, but at the current time is only used in a data capacity to provide vital encryption services.

Because of the regional nature of the system, participating members have invested in excess of \$150.5 million as well as over \$19.2 million in state and federal grant funds to increase regional use of the system and reduce the cost of membership. Grants have been used to link multiple dispatch centers; add the City of Tempe to the network; increase system capacity to allow greater roaming and interoperability; add several mountaintop sites to be used for very wide-area coverage, emergency backup and wide area interoperability; provide connectivity to the City of Peoria's new system; provide cache radios to be used for emergencies; and an emergency hospital intercommunications network.

The RWC system has been effectively used to provide interoperable communications for numerous special events in the Phoenix metropolitan area. The system is commonly used for coordinating the movements and security of government officials, including the recent presidential visit to the East Valley. The system provides

support for the annual Fiesta Bowls, BCS football games, PGA Waste Management Phoenix Open golf tournaments, NASCAR races, and was public safety's primary radio communications infrastructure for the 2008 Super Bowl, 2009 NBA and 2011 MLB All Star games. The City of Glendale has been selected as the site for the 2015 Super Bowl and will again rely on the RWC for this high security world-wide event. The 2008 Super Bowl, in particular, clearly demonstrated the need for a truly regional radio system and has prompted more discussions between the metropolitan cities, counties and state, on how to effectively use the RWC while minimizing the costs associated with maintaining individual, disparate systems.

III. PROBLEM

As is the case with the State of Louisiana's LWIN and most governmental entities across the country, public safety agencies are facing significant budgetary challenges due to the declining economy. Reductions in revenue have prompted corresponding consolidations and even reductions in service delivery. Maintaining basic government services as well as radio system infrastructure and subscriber equipment (radios) will be major challenges for member agencies for many years to come.

Furthermore, in systems of this size, a conversion to comply with the FCC's 2017 mandate to narrow band 700 MHz requires several years of planning and coordination. This narrow banding rule requires that a majority of existing system infrastructure and subscriber handheld units are not just converted, but replaced. Even when considered on a system by system basis, the impacts to each system are large, but when the number of interoperability users is also considered, the changes to one system may significantly impact many other allied agency users.

For these reasons, the RWC and RPC Region 3 are in support of the State of Louisiana's request for the Commission to modify the current rules addressing spectrum efficiency as cited above. If the current December 31, 2016 deadline is not extended, it will have a significant negative impact for all public safety agencies and members and users of these and other radio communications systems.

IV. PROPOSED SOLUTIONS

The RWC and Region 3 RPC's position, as articulated in their Petition for Expedited Action filed with the FCC on February 21, 2012, has five (5) main points for consideration, several of which align with the State of Louisiana:

1. 700 MHz frequencies are being allocated effectively and used efficiently in the State of Louisiana and in Arizona Region 3.

2. TDMA standards have not yet been fully ratified and consequently, there is a lack of available products, specifically subscribers, which comply with the standard.
3. Product life-cycles, costs and availability are such that agencies are seriously challenged to maintain their infrastructure and subscribers in sound, up-to-date working order.
4. Frequency management, including narrowbanding, is best managed regionally by the local agencies to best fit the needs of their area.
5. TDMA conversion for systems using a combination 700 MHz and 800 MHz requires more changes than just to the 700 MHz frequencies. 800 MHz equipment must be transitioned to 700 MHz in order to provide critical seamless roaming capability.

V. SUMMARY

All of these points and justification come together to support the State of Louisiana's LWIN and the RWC's request to waive or delay the narrow-banding mandate to at least December 31, 2020; or a yet to be determined date based upon certain criteria set forth by the Commission in concert with the local Regional Planning Committees.

This is a critical time in the short success stories of the State of Louisiana's LWIN, the RWC and other regional public safety systems. The RWC and RPC Region 3, supporting the State of Louisiana; requests a swift review, decision and response from the FCC's Public Safety and Homeland Security Bureau. A positive decision to waive or extend the FCC 2017 deadline for narrow-banding 700 MHz will allow the State of Louisiana, the RWC and other public safety radio communications system managers sufficient time to plan and fund those portions of the affected systems that require immediate, necessary upgrades or replacement.


David A. Felix, Executive Director
Regional Wireless Cooperative