

700 MHz Regional Planning Committee

Region 35 Oregon

Changes to Eligibility, Application Processes, Technical Parameters
Proposed in 4.9 GHz

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Reference FCC Docket 07-100

CAPRAD would be a more suitable 4.9 GHz registration database than ULS. The 4.9 GHz spectrum is a valuable regional asset and its value and visibility could get lost if residing in the ULS database. Plus, residing on CAPRAD would help stimulate the importance of keeping CAPRAD updated and current as a valuable tool for public safety and RPC use. The RPCs could not coordinate new applicants without a detailed and easy to use database.

4.9 GHz applications should be required to receive concurrence from their respective RPC's before filing. It would of course require a larger commitment from the RPC's, but it would allow a more flexible use of the spectrum. For example, if one region wanted to use the entire spectrum just for back haul, it would insure that adjacent regions will not be affected by this type of use.

The Regional Planning Committees (RPCs) should perform the coordination function. However, this could prove to be difficult without proper resources. One important resource would be to have the proper path analysis software that is normally used in the MW industry.

The required elements of the 4.9 GHz Regional Plan to be modified should include details of technical parameters for FCC licensing requirements for fixed links. This would ensure that future systems do not cause interference with existing systems. 4.9 GHz FCC licensees should be required to provide information similar to existing part 101 MW requirements.

RPC's should be required to modify their plan every so often to accommodate evolution of technology within the band.

Only frequency coordination on primary permanent fixed point to point should be required, but concurrence would be required on all applications.

Expand eligibility to allow critical infrastructure industry (CII) to license 4.9 GHz fixed point-to-point on a primary basis. CII sites are normally constructed as hardened sites. I.e., R56 grounding, security, battery and generator, equipped with high B/W fiber or MW connectivity.

Deny eligibility to commercial users to license 4.9 GHz. Once commercial users started using the 4.9 GHz it would start a tendency that commercial user would see as a free opportunity for spectrum and not give it up once they started using it.

Changing to usage-specific licensing by designating certain radio service codes for each type of use (fixed link, mobile only, airborne, interconnected with the public safety broadband network) this type of licensing would facilitate frequency coordination, because it would enhance the database with more specific information on usage.

Fixed point-to-multipoint operations supporting narrowband traffic should not be allowed as primary.

The 4.9 GHz band can complement the nationwide public safety broadband network because back haul links would be extremely important, especially in rural areas that have no fiber or other PS or commercial connectivity.

The 4.9 GHz band would provide a supplement to existing MW public safety's fixed point-to-point backhaul needs.

Channel aggregations greater than 20 MHz should be allowed. Wider than 20 MHz would be needed when back haul would be required to pass larger amounts of data, such as video. I.e., what B/W is required to handle G bits of data from large site?

Certain 4.9 GHz frequencies should not be designated for specific uses. Each regional would probably have different requirements. For example, some systems may the entire spectrum just for back haul.

A maximum ERP limit should not be imposed. If frequency coordination is required; than the ERP could be set to any value that is required to provide the necessary fade margin.

A specific polarization (vertical or horizontal) should be required. If frequency coordination is required than polarization would depend on existing systems to minimize interference.

Require 4.9 GHz licensees to file periodic deployment reports detailing how they are deploying their systems. It could be something similar to filing a schedule K.

4.9 GHz FCC licensees should be required to provide information similar to existing part 101 MW requirements.

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