

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of:	)	
	)	
Amendment of Part 90 of the Commission's Rules	)	WP Docket No. 07-100
	)	
Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band	)	PS Docket No. 06-229
	)	
Service Rules for the 698-746, 747-762 and 777-797 MHz Bands	)	WT Docket No. 06-150
	)	

**REPLY COMMENTS OF REGION 5 700 MHZ REGIONAL PLANNING COMMITTEE**

**Region 5 700 MHz Regional Planning Committee**

The Region 5 700 MHz Regional Planning Committee (Region 5) is formed to plan the guidelines and channel allocations for the narrowband 700 MHz public safety band. Also included in the plan are 4.9 GHz planning elements. Region 5 consists of the ten southern counties of California. Those Counties are:

1. Imperial
2. San Diego
3. Riverside
4. Orange
5. Los Angeles
6. San Bernardino
7. Kern
8. Ventura
9. San Luis Obispo
10. Santa Barbara

**Reply Comments**

The revision of the current rules governing licensing and operations for public safety in the 4.9 GHz band is important for public safety to more effectively utilize the band. Region 5 agrees with the approach that NPSTC proposes for developing a national plan for this band. The

chance to develop a nationwide plan with coordination and regional planning committee input will result in the best possible rules for public safety to more effectively use the 4.9 GHz band. Region 5 also believes it is important for the plan to recognize regional differences so all regions can most effectively use the spectrum. Region 5 is aware this may make the coordinators job more complicated in keeping track of different requirements for some regions but also strongly believes that extra complication of varying requirements could be incorporated in the computer software programs the coordinators use. The benefits will be well worth the effort. Region 5 in the existing plan for both 800 MHz NPSPAC Spectrum and the 700 MHz spectrum uses propagation predictions based on matrix based Longley/Rice models rather than contours used by most other regions. This has allowed closer spacing of base stations (also required is use of directional and down tilted antennas) and greater reuse of channels. Region 5 believes that similar to the different requirements used at 700 and 800 MHz, this region will need to specify tighter requirements for the 4.9 GHz band in order to most effectively and efficiently use the 4.9 GHz spectrum to benefit the public safety agencies in Region 5.

One important task that the regional planning committees (RPC) do is the review of applications to insure all region requirements are followed. This role needs to be in place under a national plan that includes coordination. Currently the RPC reviews and approves the application prior to sending the application to a coordinator. If this process changes (and that is likely under a national plan) then the RPC must have reasonable time after a coordinator completes coordination and before the application is sent to ULS to review and comment of issues with the application. This may require extra average processing times for 4.9 GHz applications.

Region 5 also supports the proposal of NPSTC and others to use the FCC ULS system for the database needed to support more effective license coordination. The FCC database already stores the type of data required and would be the most cost effective database for public safety licensees.

### **Summary**

Region 5 supports a national planning effort to formulate proposed rules for the 4.9 GHz band.

That effort must allow for Regional input and Regional differences to most effectively and effectively use the band. RPC's must have reasonable time to review and comment on applications before they are sent to ULS. The proposal to use the FCC ULS database is the best and most cost effective way to store data needed for frequency coordination.

Respectfully Submitted

A handwritten signature in cursive script, appearing to read "David Buchanan", followed by a long horizontal flourish.

David Buchanan

Chair Region 5 700 MHz Regional Planning Committee