

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

In the Matter of)	
)	
Proposed Amendments to the Service Rules)	
Governing Public Safety Narrowband)	PS Docket No. 13-87
Operations in the 769-775/799-805 MHz)	
Bands)	
)	

**COMMENTS OF THE REGION 49 (CENTRAL TEXAS) REGIONAL PLANNING
COMMITTEE**

The Region 49 Regional Planning Committee (RPC) is one of 55 such RPCs in the country, and one of six RPCs in the state of Texas. Region 49 covers a 30 county area in the center of the state, including the capital city of Austin and several other metropolitan areas, and several tens of thousands of square miles of rural area. 700 MHz P25 Phase I systems, operating at 12.5 kHz bandwidth, are currently used in four of our counties, and additional systems are currently being planned. We are also keenly aware of the issues presented by heavy urban use of the band due to our proximity to adjacent Region 51, which includes the City of Houston and its surrounding Harris County.

Following several in-person and on-line meetings held to consider the Commission’s Notice of Proposed Rule Making (NPRM), we welcome this opportunity to present our comments on several of the issues raised therein.

December 31, 2016 Deadline for Narrowbanding Transition to 6.25 KiloHertz Bandwidth

Technology –As stated in the NPRM, the December 31, 2016 deadline was established by the Commission in 2002 based on estimated time frames for narrowbanding technology development and a 10 year useful life for equipment. In fact, P25 Phase II-capable equipment was not available for purchase until after most 700 MHz licensees in our region, due to various grant funding deadlines, had committed to purchasing P25 Phase I-only-capable equipment. We are also finding that this equipment is generally built better than the equipment available prior to 2002, and believe that 15 years is a reasonable estimate of its useful life. Maintaining the December 31, 2016 narrowbanding deadline will make this equipment prematurely obsolete and cause unnecessary financial hardship for many licensees, as has been described in detail in the various requests for waivers received by the Commission.

As noted previously, we have already witnessed the need for maximum channel efficiency in the most urban area of our state (The City of Houston currently operates a P25 Phase II 700 MHz trunked system using both time slots on all available 700 MHz general use channels), and anticipate a similar need in some other urban areas. However, we also recognize that such a high level of efficiency is not likely to ever be needed in the majority of the land area in the state or the country. We see no benefit being derived from maintaining the December 31, 2016 narrowbanding deadline. Like the City of Houston, those that need the increased efficiency are already free to use that technology. Interoperability will still be maintained through continued use of P25 Phase I technology on the interoperability channels. Eliminating the narrowbanding deadline, rather than extending it, will give licensees the greatest flexibility and maintain their opportunity to develop and purchase the most cost-effective systems to meet their actual needs.

Air-Ground Communications on Secondary Trunked Channels – We have witnessed regular use of current 700 MHz trunked system talk groups for air-ground communications. We share NPSTC’s concern that such airborne use on digital trunked systems may be causing interference problems which are particularly difficult to recognize and identify. We are not aware of any current use of the secondary trunked channels, and do not foresee any interference potential resulting from airborne low-power use as proposed by NPSTC. We support the NPSTC proposal.

Reserve Channels – Although we can see the potential benefit of temporary deployable trunked systems, we believe that very few organizations will be able to afford and develop such systems. Because we have witnessed both 700 MHz and 800 MHz channel shortages in Texas’ most urban area, and anticipate similar shortages in others, we believe that dedicating any more than 16 of the 48 reserve channels for such use would be excessive. We believe that the reserve channels that are not dedicated for temporary deployable trunked systems should be designated for general use, and should be administered in each region by their RPC.

Power Limit for Low Power Channels – We are concerned that a power increase from two to 20 watts on the low-power channels could easily negate the unique values inherent to low power operation. In certain instances, communications over a limited range with frequent channel re-use is highly desirable. We believe that those licensees that need additional power should apply for a waiver of the power limit on one or more of the low power channels subject to regional planning, with prior RPC coordination, review, and approval.

Interoperability Network Access Code – We strongly believe that effective interoperability can only be achieved by standardization of all potential variables affecting two-way radio communications. The Commission has already addressed the variables of frequency, bandwidth, and modulation format in the rules. Adding the single, standard Network Access Code of \$293, as recommended in the ANSI channel-naming standard, would eliminate one more potential cause of error, confusion, or interference on the interoperability channels.

User Access to Interoperability Channels – Having 32 interoperability channel pairs in the 700 MHz band is good. However, in some environments too much of a good thing can be counterproductive. All of us who operate trunked systems are continually challenged by “subscriber overload,” the condition in which a radio user loses the ability to effectively use the full capabilities of their radio. Training, practice,

and exercises are commonly used to overcome this tendency. Despite these efforts, there are users, and even departments full of users, who are simply overwhelmed by some modern radio's capabilities. Therefore, we believe that licensees should be allowed flexibility in this matter, recognizing that some State Interoperability Executive Committees (SIECs, or their equivalents) or RPCs may require certain minimum channel loads in subscriber radios to maintain rapid access to interoperability within their jurisdictions.

Analog Operation on the Interoperability Channels – Consistent with our belief in the standardization of all variables affecting communications on the interoperability channels, we believe that only one modulation format, P25 Phase I, should be permitted. Allowing both analog and P25 Phase I on the interoperability channels increases the potential for error, confusion, and interference that will compromise the effectiveness of interoperable communications.

Respectfully submitted,

/s/ Ronald G. Mayworm

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