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

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

COMMENTS OF:
THE REGION 6 (NORTHERN CALIFORNIA) REGIONAL PLANNING COMMITTEE
CONCERNING
THE SEVENTH REPORT AND ORDER
NOTICE OF PROPOSED RULEMAKING

The Region 6 (Northern California) 700 MHz Regional Planning Committee (RPC) submits these comments pertaining to certain sections of the FCC Notice FCC 13-40 released April 1, 2013 and published in the Federal Register April 18, 2013. Specifically the Region 6 RPC submits comments on PS Docket No. 13-87, Proposed Amendment to the Service Rules Governing Public Safety Narrowband Operations in the 769-775/799-805 MHz Bands.

Background

The Region 6 RPC represents the 48 northern counties of California, north of the northern boarders of San Luis Obispo, Kern, and San Bernardino Counties. Within this region is the San Francisco Bay area which has several regional 700 MHz radio systems that are either in planning, in the implementation phase, or are in service. When completed, these systems will serve nearly 30,000 public safety subscriber units across the greater San Francisco Bay Region.

The Region 6 RPC has met and discussed this Notice of Proposed Rulemaking (NPRM) and submits these comments.

A. December 31, 2016 Deadline for Narrowbanding Transition to 6.25 kilohertz Bandwidth Technology

The Region 6 RPC recommends the delay of 6.25 kHz voice efficiency to December 31, 2024. At the present time most 700 MHz systems are either just completing their implementation phase, or are still in the implementation phase. These systems were designed and purchased based on 12.5 kHz technology. To require them to be converted to 6.25 efficient technology on December 31, 2016 would be unduly burdensome financially as the equipment has not yet reached its expected life-cycle replacement age. Setting the date at December 31, 2024 provides a 10 year time frame during which equipment will be replaced as part of its normal life-cycle replacement process and the standards for this technology will be fully developed and adopted.

If the Commission does set a new deadline for conversion to 6.25 kHz technology, Region 6 recommends requiring manufacturers to include 6.25 kHz technology in all radios capable of operating in the band starting two years prior to that deadline.

The allocation of channels is a concern in the transition to 6.25 kHz efficiency. Systems are currently being designed based on 12.5 kHz channel needs for predicted traffic loading, in some cases ten years out. As these systems convert to 6.25 kHz efficiency, these systems will presumably now have excess capacity. Region 6 recommends that provisions be made to recover the excess capacity to avoid the warehousing of channels.

B. 2010 NPSTC Petition- Air-Ground Communication on Secondary Trunking Channels

Region 6 supports the use of the secondary trunking channels for air to ground use as proposed by the National Public Safety Telecommunications Council (NPSTC). Region 6 concurs with the NPSTC recommendation that use of these channels be coordinated by the State Interoperability Executive Committees (SIECs).

Region 6 does not believe that the air to ground use of these channels will have any greater impact on other 700 MHz channels or broadband systems that the original intended use of these channels.

C. 2008 NPSTC Petition – Proposed Revisions to 700 MHz Narrowband Channel Plan

1. Nationwide Interoperability Travel Channel

Region 6 supports NPSTC's proposal to convert one of the National Interoperability Calling channels to a National Interoperability Travel channel. The fire service in California has been using a statewide VHF channel as a travel channel for fire crews responding long distances to large wildland fires for years with great success. The travel channel provides a channel for use in coordinating among resources traveling together while en route as well as directing resources as they arrive on scene.

2. Tactical Voice Communications on Data Interoperability Channels

Region 6 supports NPSTC's proposal to allow tactical voice communications on a secondary basis on the upper two data-only interoperability channels. Currently in Region 6 there is no use of these channels for data-only interoperability so secondary use of the upper two channels for tactical voice would not have any impact.

3. Reserve Channels

Region 6 supports NPSTC's proposal to reallocate the 48 reserve channels for transportable trunked radio systems and place these channels under Regional Planning Committee control. Concurrent with that recommendation, Region 6 also supports the potential use of some of the reserve channels for existing T-Band licensees relocating to 700 MHz in areas with insufficient 700 MHz channels as requested by the Los Angeles Regional Interoperable Communications System (LARICS). Allocation and use of the reserve channels for permanent systems should be under the control of the RPC.

4. Power Limit for Low Power Channels

Region 6 supports NPSTC's proposal to increase the maximum output power limit on the low power channels from 2 watts to 20 watts. Portable radios which comprise a majority of the use of these channels, are designed with a maximum power output of 3 watts so the increase from 2 watts to 3 watts is of little consequence. The 2 watt limit however presents a problem for mobile radios that are not capable of operating at such a low power level.

Region 6 does not believe that increasing the limit will have a significant interference impact to on scene communications. In those few cases where it does present a problem, the incident commander can direct the units on scene to use portable radios only.

D. Miscellaneous Issues

3. Narrowband Power Limits

Region 6 supports the Commission's proposal to correct various rule discrepancies, consolidate Section 90.545 into Section 90.541 and remove Section 90.545. Region 6 also supports the use of Effective Radiated Power (ERP) as the power limit rather than transmitter power output (TPO).

4. Interoperability Network Access Code

Region 6 supports the use of standard Network Access Code (NAC) for the interoperability channels as established in industry standard APCO/NPSTC ANS 1.104.1-2010 or any subsequent revision. Use of a standardized NAC across all radios using the interoperability channels is critical to maintaining interoperability. Region 6 does not feel that the Commission should specify a specific code in the rules.

5. User Access to Interoperability Channels

Region 6 supports the requirement that mobile and portable radios be capable of operating on all of the national interoperability channels but should not require that they be programmed for all national interoperability channels. National Interoperability channels are designated for specific disciplines and some agencies may not want to program law channels into fire units or visa versa. It should be sufficient that the radio be capable of operating on the National Interoperability channels appropriate for the discipline to which the radio is assigned.

6. Analog Operation on the Interoperability Channels

Region 6 does not support the use of an analog mode on the interoperability channels. Allowing for the potential mix of both analog and digital radios creates another source of confusion during emergency operations. In a life or death situation it is imperative that everyone get the message. If some radios are operating analog and others are operating digital, there is the potential that some radios may not receive the critical message and lives could be at danger.

If there is a critical need for analog operations, the low power channels, as designed in 90.531(b)(3) and (b)(4) allow for analog operation. Although currently limited to 2 watts, if the power limit is increased to 20 watts as part of this proceeding, those channels should be sufficient to serve the need of any analog operation.

Further, Region 6 requests the Commission clarify rule 90.535(a) regarding what is meant by the statement "Mobiles and portable transmitters may have analog modulation capability only as a secondary mode in addition to its primary digital mode". As stated in this NPRM, "Considered together, these two rules (90.548(a)(1) and 90.535(a)) imply that analog operation is permitted." The rules should not be left to interpretation where one could imply as to what is permitted.

Respectfully Submitted

John Lemmon, Chair
Region 6, Northern California
700 MHz Regional Planning Committee
601 Sequoia Pacific Blvd.
Sacramento, CA 95811