

November 12, 2013

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: Request for Waiver of WMATA, PS Docket No. 13-87Dear Ms. Dortch:

Parsons writes to express its support for a waiver of §90.531(b)(2) of the Commission’s rules and of other such rules as needed to allow the Washington Metropolitan Area Transit Authority (“WMATA”) to obtain licenses for 16 (12.5 KHz) frequencies of the 700-MHz narrowband reserved channels identified in §90.531(b)(2).

Much interest was generated regarding the 700 MHz broadband spectrum for broadband public safety communications use. The 700-MHz band offers excellent penetration through buildings, which is particularly useful for emergency responders and *E911* services. Favorable propagation characteristics, which extend coverage significantly for the same transmission power – which translates into a need for less transmission infrastructure - motivate investment in the 700-MHz band. The 764- to 776-MHz and 794- to 806-MHz blocks have already been dedicated to public safety.

As explained in the WMATA request, the passage of the Middle Class Tax Relief and Job Creation Act of 2012 altered its plans, and those of other public safety jurisdiction, to use T-Band spectrum for deployment of a new public safety system compliant with Project 25 (P25) standards. Parsons recognizes that public transportation systems throughout the world have been among the primary targets of terrorists and believes that it is in the public interest for this issue to be considered by the FCC expeditiously.

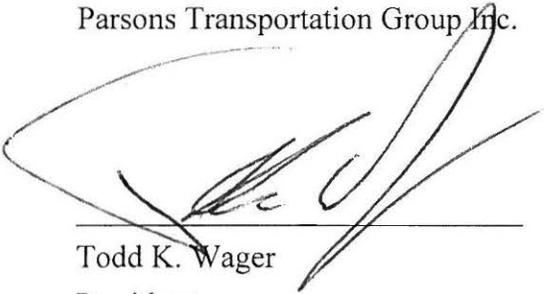


Through our involvement with the Positive Train Control (PTC) implementation and other RF projects we see on a daily basis how transit providers such as WMATA struggle with the lack of spectrum. Transit agencies are geographically diverse and must rely upon RF for their daily operations, and no viable technical alternatives exist. Not having access to a stable set of RF assets erodes their ability for long term planning and frequent changes cause them to expend capital assets. Simply put, they need adequate assets to fulfill their mission. WMATA is serving the common good; assisting WMATA in this effort benefits all.

Parsons respectfully urges the FCC to release the Petition for Waiver for Comments and Reply Comments as quickly as possible so that this vital matter affecting national security and operation can be addressed promptly within the FCC's rules or in the alternative, to act under §1.925 and grant the Petition.

Sincerely,

Parsons Transportation Group Inc.

A handwritten signature in black ink, appearing to read 'Todd K. Wager', is written over a horizontal line. The signature is stylized and extends above and below the line.

Todd K. Wager  
President