

November 22, 2013

Region 24 700 MHz Regional Planning Committee Comments on the 4.9 GHz National Plan, Docket 13-209

The Region 24 700 MHz Regional Planning Committee supports the concept of a National Plan for the use of public safety spectrum between 4940-4990 MHz. Region 24 members were involved in the development of this plan and support the implementation of a national set of guidelines and improved public safety use of the band in conjunction with a coordination process that takes 700 MHz regional planning committees into account.

Region 24 would like to make recommendations for Commission consideration to some of the elements of the proposed 4.9 GHz plan, as submitted. They are:

We support a band plan that has structure with flexibility to meet the needs of users and applicants in each region. We support regions being able to provide additional criteria, above the baseline national plan, to a coordination process that best meets the operational needs of their current licensees as well as new applicants.

We support the ability for regional planning committees to develop their own regional plans as guidelines for applications in their region. The proposal provides for 120 days for regions to develop and submit plans to the Commission for approval for use of the 4940-4990 MHz spectrum. Due to the volunteer nature of regional planning committees in general, we feel that additional time, up to 180 days, would be a more suitable time frame for regional planning committees to

be required to submit their regionally specific plans to utilize 4940-4990 MHz in their region.

We support the FCC's Universal Licensing Service (ULS) being expanded to accommodate the Part 101 feature set identified to be included in the 4940-4990 MHz coordination process. We agree that any other option to implement a 4940-4990 MHz database will be more costly and less effective than the expansion indicated of the ULS system in the NPSTC proposal.

Region 24 supports the proposal in the manner in which it provides existing 4940-4990 MHz licensees currently operating point to point stations in the band on a secondary basis due to their implementation not supporting broadband operations being able to again obtain primary status by moving to 1 MHz channels between channels 14-18 in the proposed channel plan. While this method may have a cost associated with it in requiring existing licensees to move their operations in the band, this approach is an improvement as it allows existing licensees a path to primary status which is not currently available to them.

Region 24 thanks the Commission for the opportunity to provide comments on this important issue.

Regards,

Stephen Devine, Chairperson

Region 24 700 MHz Regional Planning Committee

