

**Region 13 700MHz & NPSPAC Regional Planning Committee  
November 26 2013**

**Subject: Region 13 700 MHz Regional Planning Committee Comments on the 4.9 GHz National Plan,  
WP Docket No. 07-100, PS Docket No. 06-229, WT Docket No. 06-150**

The Region 13 700 MHz Regional Planning Committee discussed this issue during its recent meeting of November 20 2013 and supports the concept of a National Plan for the use of public safety spectrum between 4940-4990 MHz. Region 13 members have been involved in the development of the NPSTC plan and supports the implementation of a national set of guidelines intended to improved public safety use of the band in conjunction with a coordination process that includes 700 MHz regional planning committees nationally into account.

Region 13 would like to make some recommendations to some of the elements of the plan for the Federal Communications Commission to consider in support of the proposed 4.9 GHz plan, as submitted.

Those elements are:

- We support a band plan that has structure with flexibility to meet the needs of users and applicants in each region.
- We support the 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 the regions to review the national plan, develop any modification necessary for the respective region and submission of the plan to the Commission for approval of the 4940-4990 MHz spectrum regional adopted plan. Due to the volunteer nature and the general meeting schedules of the regional planning committees in general, we feel that additional time, up to 240 days, would be a more suitable period for regional planning committees to review and adopt a regional plan and submit their regionally specific plans to utilize 4940-4990 MHz in their region to the Commission.
- We support the use of the FCC's Universal Licensing Service (ULS) expansion to accommodate the Part 101 feature set identified to be included in the 4940-4990 MHz coordination process. We agree that any other effort to implement a separate 4940-4990 MHz database will be more costly and less effective than the expansion indicated of the ULS system in the NPSTC proposal.

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- Region 13 supports the proposal in the NPSTC plan 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 would be 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 13 thanks the Commission for the opportunity to provide comments on this important issue.

Regards,

A handwritten signature in cursive script, appearing to read "William Carter", written in black ink on a light-colored rectangular background.

William Carter, Chairperson

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