

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

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| In the Matter of |) | |
| |) | |
| Emission Mask Requirements for Digital |) | PS Docket No. 13-209 |
| Technologies on 800 MHz NPSPAC |) | RM-11663 |
| Channels; Analog FM Capability |) | |
| on Mutual Aid and Interoperability Channels |) | |

REPLY COMMENTS

ON BEHALF OF REGIONAL PLANNING COMMITTEE 8

Regional Planning Committee Region 8 (RPC8) respectfully submits its reply comments to the comments received by the Federal Communications Commission (FCC) on the subject matter.

The FCC introduced the concept of Regional Planning Committees to help it (the FCC) identify regional issues that need addressing in the process of designating utilization of public safety spectrum. RPC8 in its jurisdiction for the 800 MHz National Public Safety Planning Advisory Committee (NPSPAC) Spectrum covers the New York Metropolitan areas, consisting of:

Bronx, Dutchess, Kings, Nassau, New York, Orange, Putnam, Queens,
Richmond, Rockland, Suffolk, Sullivan, Ulster, and Westchester Counties in
New York; Bergen, Essex, Hudson, Hunterdon, Mercer, Middlesex,
Monmouth, Morris, Passaic, Somerset, Sussex, Union, and Warren Counties

in New Jersey; and Fairfield, Litchfield, Middlesex, and New Haven Counties in Connecticut.

RPC8 is committed to addressing the needs of state and local governments by supporting creative use of the spectrum, accommodating new and unanticipated developments in technology, and creating and managing regional plans. To this end, RPC8 has reviewed the comments submitted to the FCC.

Emissions Mask

Simply stated, RPC8 concurs with statements made by the New Jersey Transit Corporation (NJTransit) in its comments under Emissions Masks. RPC8, through its technical subcommittee, is able to coordinate applications of varying RF bandwidths and doing so does not pose an additional burden on RPC8. NJTransit correctly identifies in its comments that *“Any extra burden would be on the licensee who would have to adhere to, perhaps, stricter spacing requirements, lower power, directional antenna patterns, etc. – all normal issues when coordinating dissimilar technologies.”*

The FCC should not impose any mandatory emissions masks in the NPSPAC spectrum. Whether analog or digital, emissions masks B and H should continue to be valid masks. Coordination and assignment of spectrum under these masks should be left to the discretion of the RPC.

InterOperability

As with any application submitted through RPC8, the applicant needs to demonstrate how this capability is met to the satisfaction of the RPCs based on the local role the entity plays.

Respectfully,

Allen J. Demcoe
Vice Chair
Region 8 800 MHz RPC