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Reference: WP Docket No. 10-700, PS Docket No. 06-229, WT Docket No. 06-150

To: The Commission

Reply comments of Vislink Inc. in response to Public Notice DA 13-2096

Vislink hereby respectfully submits its comments in response to the above referenced public notice.

I. Licensing in the 4.9GHz Public Safety Band should be based on regional rather than jurisdictional geographies.

We support the council's recommendation to use regional rather than jurisdictional licensing along with the requirement that all applications go through the frequency coordination process. We agree that these changes will promote better use of this band for both public safety and the increasing necessity to secure critical infrastructure.

Vislink is concerned about existing services that have been regionally coordinated in areas where the band may not have any more available channel allocations. A grandfather clause may be necessary to protect existing users.

In addition it may not be possible to shift certain types of services to the channels they have been allocated to operate in (in the new plan) if those channels are already being used.

Finally some of the channel bandwidths that have been allocated for certain types of services might not be adequate for existing infrastructure and may necessitate replacing equipment with more spectrally efficient devices. In some cases this may present a financial hardship on the current user.

II. Critical Infrastructure Industries.

Vislink fully supports the recommendations of the NPSTC and the comments from the Utilities Telecom Council in regards to sharing spectrum on a co-primary basis. We see

an increasing demand for wireless solutions for securing infrastructure and question whether two 5MHz channels will be enough spectrum for the future.

III. The use of directional antennas, omni-directional and down-look antennas should be permitted for air-to-ground use.

Comments submitted by Los Angeles County proposed a minor change to the recommendations submitted by NPTC in its final report to include the use of directional antennas by airborne platforms to transmit video images of an incident or event on 4.9 GHz spectrum.

In addition to the air-to-ground scenarios that Los Angeles County cited in its comments, there are other scenarios that may only be viable with the use of omni-directional antennas, including the use of tactical Unmanned Aerial Vehicles (UAVs) with real-time video transmissions and the seamless integration of airborne nodes into mesh networks.

The use of directional, omni-directional and down-look antennas on airborne platforms should be permitted in the 4.9GHz band for air-to-ground transmissions, and the risk of interference should be managed by the rule modifications recommended in the NPSTC 4.9GHz National Plan and the frequency coordination efforts of the regional planning committees.

Respectfully submitted,

/S/ Michael C Payne
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