

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

In the Matter of)
)
Amendment of Section 90.20(d)(34 and 90.265 of) PS Docket No. 13-229
the Commission's Rules to Facilitate the Use of)
Vehicular Repeater Units)

COMMENTS OF REGION 13

The Region 13, hereby submits the following comments in response to the Commission's *Notice of Proposed Rulemaking*, FCC 13-121, released September 16, 2013 ("*NPRM*"), Among other issues, the Commission's inquired as to whether additional opportunities exist to implement public safety vehicular repeater operations in other public safety bands.

The Region 13 manages the 700 MHz and NPSPAC Spectrum in most of the State of Illinois and is the recognize authority concerning these areas of the spectrum with the State of Illinois, as required by the Federal Communications Commission. We liaison with FCC certified frequency coordinators, licensees, applicants, vendors, adjacent Regional Planning Committees as well as the Commission on a regular basis to ensure our planning responsibilities and the goals of those first responder agencies we serve are met. Nationally, Regional Planning Committees consist of public safety volunteer spectrum planners and members that dedicate their time, in addition to the time spent on their regular positions, to coordinate spectrum efficiently and effectively for making it available to eligible public safety agency applicants in their respective region. Members of Region 13 participated in the National Coordination Committee (NCC) process where the rules for 700 MHz public safety spectrum were developed and in the PSWAC process that defined future public safety spectrum needs. The work the

regional planning committee members do each day reflects their dedication to public safety communications and to ensuring local public safety agencies and the user's needs *in the communities they serve* are acknowledged and met.

A PORTION OF 700 MHZ GUARD BAND SPECTRUM SHOULD BE DESIGNATED FOR MO3 USE

The Commission seeks comment on a number of issues in this NPRM, including whether or not additional vehicular repeater opportunities exist in other public safety bands. As other public safety entities and associations have already indicated in the record of this proceeding, there is a substantial need for dedicated, additional vehicular repeater channels throughout the public safety community in all bands. Region 13 feels the Commission can establish portions of the 700 MHz Guard Band spectrum specifically for dedicated, low power vehicular repeater operations for use in 700 and 800 MHz public safety trunked radio systems and managed by 700 MHz Regional Planning Committees. A portion of the 1 MHz wide 700 MHz Guard band Spectrum separating public safety broadband spectrum from public safety narrowband spectrum (762-763 MHz/792-793 MHz) is an area where nationwide vehicular repeater channels could be utilized in an efficient manner promoting low power and effecting maximum reuse of this limited spectrum resource.

The upper 250 KHz of the 1 MHz Guard Band (762.750-763 MHz/792.750-793 MHz), has been considered by many in the public safety community, as a portion of the Guard band where vehicular repeater operations can co-exist with broadband operations in the 763-768 MHz/793-798 MHz broadband spectrum. A nationwide designation of these operations, with low power implementations and managed by 700 MHz regional planning committees that can also

coordinate additional elements of narrowband spectrum adjacent to the public safety broadband spectrum, would be an efficient and effective use of the established Guard Band. While real world testing of low power 700 MHz MO3 narrowband operations alongside public safety narrowband testing can provide additional information as to exactly what portion and how much of the Guard Band can operate without conflict adjacent to broadband operations, nationwide 12.5 KHz MO3 channels can be coordinated effectively by each 700 MHz regional planning committees to ensure maximum reuse of the resource. We can envision the Commission assigning the responsibility of managing these channels in each region to the respective 700 MHz regional planning committee for inclusion in their existing 700 MHz coordination process.

THE INTRODUCTION OF DUAL BAND RADIOS INTRODUCES GREATER FLEXIBILITY IN VEHICULAR REPEATERS AND MORE COST EFFECTIVE IMPLEMENTATION

The introduction of multi-band radios that can operate in VHF/UHF/700/800 MHz allows for additional vehicular repeater configurations and scenarios that were not previously available with single band radios. A Cross Band repeater configuration, where disparate radio bands are operated between the mobile radio and the vehicular repeater, can be implemented with radio that operate in multiple frequency bands and these configurations are more cost effective and often require less filtering than “in-band” vehicular repeater configurations where the same frequency band is used by both the mobile radio and vehicular repeater. Multi-band radios implemented by public safety users today allow for more frequencies to be available in more bands than ever before and this allows for easier vehicular repeater implementation offering more options to public safety users.

COORDINATION WITH FIRSTNET

The NRPC knows that proper coordination of any portion of the Guard Band between 762-763/792-793 MHz for vehicular repeater use within each region will require coordination between the respective 700 MHz regional planning committee and FirstNet. The NRPC looks forward to working with the Commission and FirstNet to ensure that the efficient use of the 700 MHz Guard Band spectrum provides additional, effective vehicular repeater alternatives to public safety users while ensuring any use operates without impacting 700 MHz public safety broadband operations.

Respectfully Submitted

A handwritten signature in black ink on a light-colored background. The signature is written in a cursive style and appears to read "William J. Carter".

William J. Carter, Chairperson

Region 13