

**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 NATIONAL REGIONAL PLANNING COUNCIL

The National Regional Planning Council (“NRPC”), 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 NRPC feels strongly that additional opportunities existing for vehicular repeaters for public safety use in the 700 MHz Guard Band spectrum separating Public Safety Broadband Spectrum (763-768 MHz -793-798 MHz) and Public Safety Narrowband Spectrum (769-775 MHz – 799-805 MHz), which lies between 768-769 MHz - 798-799 MHz.

The National Regional planning Council is an advocacy body formed in 2007 that supports public safety communications spectrum management by Regional Planning Committees (RPC) in the 700 MHz and 800 MHz NPSPAC public safety spectrum, 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

the purpose of making it available to eligible public safety agency applicants in their respective region. Members of the NRPC 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 these regional planning committee members do each day reflects their dedication to public safety communications and to ensuring local public safety agencies and the user needs *in the communities they serve* are acknowledged and met.

As a body that advocates the *voice* of regional planning committees and one that does not attempt to consolidate and centralize that voice into a single message put forth by its association, we instead encourage each region planning committee to voice their own positions and provide their perspective to the Commission in filings and comments as best they can bringing the intimate knowledge they have to the topics being addressed and how these issues impact public safety communications capabilities within each region. Subsequently, the NRPC does not in these Comments speak on behalf of each individual regional planning committee but rather offers a position for consideration by regional planning committees on these important issues. We are hopeful that each regional planning committee will respond to the NRPC filing of this petition and to the Commission in a manner that best represents their position on these important issues. We encourage each region to do so.

A PORTION OF 700 MHZ GUARD BAND SPECTRUM SHOULD BE DESIGNATED FOR VEHICULAR REPEATER USE (MO3)

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, there is a substantial need for dedicated, additional vehicular repeater channels throughout the public safety community in all bands it currently operates in. The NRPC feels that 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 (768-769 MHz/798-799 MHz) is an area where nationwide vehicular repeater channels can 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 (768.750-769 MHz/798.750-799 MHz) has been considered by many in the public safety community as a portion of the Guard band where low power public safety vehicular repeater operations can co-exist with public safety broadband operations in the band below 768/798 MHz. A nationwide designation of these operations, with low power implementations and use coordinated 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 Guard Band established to preserve and enable both public safety broadband and narrowband operations in the 700 MHz band. While real world testing of the impact of low power 700 MHz MO3 narrowband operations to broadband operations will 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 committee to ensure maximum reuse of the resource within each region.

We 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 768-769/798-799 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

William J. Carter, Chairperson

National Regional Planning Council