

**Before the  
Federal Communications Commission  
Washington, D.C. 20054**

In the Matter of	)	
	)	PS Docket No. 13-229
Amendment of Section 90.20(d)(34) and	)	RM – 11635
90.265 of the Commission’s Rules to	)	
Facilitate the Use of Vehicular Repeater Units	)	

**REPLY COMMENTS OF THE COMMONWEALTH OF VIRGINIA**

The Commonwealth of Virginia, Department of State Police (“Commonwealth”), by its counsel, hereby submits reply comments on behalf of its Statewide Agencies Radio System (“STARS”) to the comments filed by various parties in response to the September 16, 2013 Order and Notice of Proposed Rulemaking in the above matter (FCC 13-121), inviting comments in the Notice of Proposed Rulemaking on amendments to provide for the expanded use of mobile repeaters for public safety.

**INTRODUCTION**

STARS is a twenty-two state agency public safety grade statewide integrated voice and data system. STARS uses a digital trunked VHF narrowband system, which relies heavily on cross band 700 MHz digital vehicular repeater units (DVRS) in over 3,000 public safety vehicles to support public safety communications. The Commonwealth, on behalf of STARS, wishes to offer reply comments in support of more VHF frequency availability for vehicular repeater units (mobile repeater stations, or “VRS”), and in support of the Commission’s adoption of rules that facilitate the use of such additional frequencies.

## REPLY COMMENTS

The Commonwealth was pleased to see that, apart from the utility industry comments, there appears to be a broad consensus in support of the Commission's proposal to allow VRS use of six frequencies in the 173 MHz band currently designated for fixed remote control and telemetry operations.

The comments also show that filtering is not practical, and that the light use of these frequencies for telemetry monitoring makes shared use of these channels, with coordination and exclusion zones, the best solution.

With respect to the proposal to increase the power limit from 2 watts to 5 watts, it is notable that both APCO and NPSTC support this change.<sup>1</sup>

The Commonwealth would note its strong disagreement with Pyramid's assessment that an increase of the power limit from 2 watts to 5 watts would be "nice", but it is not necessary to accomplish the needs of VRS units.<sup>2</sup> Pyramid admits that more than 2 watts could provide better building penetration, but its comments appear to assume that the use of VRS units are in a very limited footprint, principally inside buildings.

In fact, the Commonwealth's statewide use through STARS of more than 3,000 VRS units (not manufactured by Pyramid) is for geographically statewide use including state parks and forests. A highway trooper, a K-9 unit, or park ranger may be searching in rough terrain, including wooded hills and ravines, hundreds of yards from their radio car, looking for an armed fugitive or a lost child. The difference between 2 watts and 5 watts may provide the additional coverage needed to maintain communications.

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<sup>1</sup> Comments of APCO (Association of Public Safety Communications Officials - International, Inc.) p. 2 and Comments of the National Public Safety Telecommunications Council (NPSTC) p. 4.

<sup>2</sup> Comments of Pyramid Design & Manufacturing, Inc. p. 3-4.

The widespread and statewide nature of the Commonwealth's use of VRS emphasizes the need for multiple telemetry frequencies, providing wide area coverage while avoiding interference with a particular local exclusion zone by switching to another frequency.

### CONCLUSION

Mobile Repeater Stations (VRS) are a critical tool for public safety users who must go outside their vehicles or outside fixed locations. The number of VHF frequencies available for statewide VRS use should be increased, to allow first responders to select the best channel for VRS operations, least likely to cause interference and with maximum range.

The Commonwealth supports any Commission action necessary to make these additional channels available for public safety use, particularly by statewide agencies, and urges that the technical rules governing their use reflect practical considerations including 5 watt power levels and cost practicality to ensure maximum efficiency and utilization. Protecting first responders in the field and helping them to carry out their public safety mission should be the paramount consideration and should be approached from a practical standpoint.

Respectfully submitted,

COMMONWEALTH OF VIRGINIA  
DEPARTMENT OF STATE POLICE

By 

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 23<sup>rd</sup> day of January, 2014, a copy of the foregoing Reply Comments of the Commonwealth of Virginia was sent by email to Thomas.Eng@fcc.gov.



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Peter E. Broadbent, Jr.