

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of )  
 )  
Wireless Telecommunications Bureau Seeks )  
Comment on AT&T Request for Waiver to Permit ) WT Docket No. 13-202  
Power Spectral Density Model for 800 MHz Cellular )  
Operations in Three Florida Markets )

**FOLLOW-UP COMMENTS  
BY THE STATE OF FLORIDA  
TO THE AT&T REQUEST FOR WAIVER**

1. The State of Florida, Division of Telecommunications, Bureau of Public Safety offers follow-up comments to the Wireless Telecommunications docket in the above referenced matter. After ensuing dialogue with AT&T and considering AT&T's response to our initial input filed December 3, 2013, we submit these follow-up comments.
2. While we were initially hesitant over AT&T's request for waiver, we are encouraged by the dialogue toward establishing well-defined criteria for technical and operational conditions. Additionally, on February 6, 2014, AT&T responded to the State of Florida's initial input at paragraph 7 by addressing each of the four conditions individually.
3. The first of our four conditions called for testing in coordination with "public safety licensees..." for which AT&T responded with a proposed test plan and a test plan execution. We agree with Miami-Dade County's letter to the FCC dated March 24, 2014, on the criteria for the "Technical and Operational procedures be incorporated as part of all carrier's deployment strategy"; but, add reference to FCC Rule section 90.672 for measurement data that may be expected in addition to the "on/off test" in the Test Plan Execution of the procedures cited above. We want to emphasize that AT&T and any other carriers work with the public safety entities (PSEs) to ensure the proposed test plan and test plan execution is carried out to the satisfaction of the respective PSEs. In this instance, it should be a joint team comprised of AT&T the South Florida PSEs. The specific sites need to be well-defined, documented and agreed to jointly by the respective PSEs and AT&T. Additionally, AT&T and any other carriers need to disclose their site information (e.g., tower height, frequencies, coverage plots, and site coordinates) to the PSEs for the test plan execution and for future rfi resolution.
4. The second of our four conditions called for quarterly check-ups during the first year. AT&T proposed in their response to have one quarterly meeting with additional meetings as needed. Hence, we modify our initial comments to agree with AT&T's response.

5. The third of our four conditions called for immediate follow-up and cooperation on interference suspected. AT&T's response cited a process already in place to address interference (i.e., "An 800 interference website established under Section 90.674... for interference mitigation in most cases...").<sup>1</sup> Hence, we modify our initial comments to agree with AT&T's response.
6. The fourth of our four conditions called for AT&T to be financially responsible to remedy interference to public safety radio systems caused by AT&T. AT&T agreed "...they have the responsibility to eliminate the interference to public safety caused by AT&T." Further, AT&T cites "...FCC 04-168 in docket WT Docket 02-55 Paragraph 128..." to back up their responsibility. We agree with AT&T's responsibility demonstrated by their reference to the aforementioned order, which reinforces our position on this condition.
7. We applaud AT&T working with the PSEs in South Florida and respecting the needs for reliable public safety land mobile radio communications. We stand ready to continue working with AT&T toward a jointly-established test plan and a test plan execution. Reiterating paragraph 3 herein, the specific sites need to be well-defined, documented and agreed to jointly by the respective PSEs and AT&T.
8. For any additional information concerning these comments, contact Mr. Carlton Wells of the Bureau of Public Safety of the State of Florida, Division of Telecommunications at (850)-922-7426, email [carlton.wells@dms.myflorida.com](mailto:carlton.wells@dms.myflorida.com)

Respectfully submitted,

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Bureau of Public Safety  
Division of Telecommunications  
State of Florida

April 18, 2014

CWW: Follow-up comments to FCC WTD No 13-202

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<sup>1</sup> <http://www.publicsafety800mhzinterference.com/CTIAWeb/index.aspx>