

# **The FCC Narrow Band Rules**

## **Call for Support**

### **Petition for Reconsideration**

Earlier this year, the FCC issued rules that will require public safety licensees in the VHF (150-170 MHz) and UHF (421-512 MHz) bands to convert to narrowband (12.5 kHz) operation by 2018. While that is more than reasonable, the FCC also adopted rules that could force public safety agencies to convert their systems much sooner, or forgo critical system expansions, hamper their interoperability and prevent routine equipment replacements. Indeed, the new rules prevent applications for expansion of existing 25 kHz systems as of just January 13, 2004.

The Association of Public-Safety Communications Officials-International, Inc. (“APCO”), the International Association of Fire Chiefs, Inc., and the International Municipal Signal Association (“IAFC/IMSA”), International Association of Chiefs of Police (“IACP”), Major Cities Chiefs Association (“MCCA”), National Sheriff’s Association (“NSA”), Major County Sheriff’s Association (“MCSA”), and the National Public Safety Telecommunications Council (“NPSTC”) have filed a petition for reconsideration of these new rules, and encourage your prompt support for the petition. The following is excerpt from the petition, directions for finding the full text on the Internet, and information as to how you and your agency can voice their support for the petition.

#### **Introduction and Summary**

The [new rules] reflect the Commission’s desire to improve spectrum efficiency in the crowded VHF and UHF land mobile radio frequencies below 800 MHz. The goal is to move licensees to narrower channels and, in theory, multiply the number of available channels within the same amount of spectrum. Prior efforts to “refarm” land mobile spectrum have been ineffective, due in part to the absence of a requirement that licensees convert to more efficient narrowband radio equipment by a specific date. Instead, the Commission had merely used its equipment authorization process to force manufactures to offer narrowband equipment, without any concurrent requirement that users purchase or deploy narrowband capabilities.

Now, the Commission has taken a more affirmative step and established ultimate dates by which licensees must implement narrowband (12.5 kHz) equipment for existing systems. For public safety licenses, a deadline of January 1, 2018, was established for VHF High Band (150-170 MHz) and UHF (421-512 MHz) systems. We do not object to a mandatory conversion date, which we agree is necessary to achieve better spectrum efficiency in the land mobile spectrum. Indeed, if other aspects of [the new rules] modified as discussed below, we believe that the 2018 deadline can and should be moved “up” to January 1, 2013.

The Commission went well beyond adopting a final date for narrowband conversion. It also mandated that as of January 13, 2004, applications to expand the coverage area of existing systems would only be approved for narrowband (12.5 kHz) operation. The Commission also adopted rules that will terminate the manufacture and importation of radios with “wideband” (25

kHz) capability by 2008, well before the date by which licensees must otherwise cease wideband operations. Finally, the Commission limited licensees' flexibility to combine channels, while maintaining equivalent throughput efficiencies, for mobile data or multi-bandwidth equipment.

If not changed, the "near-term" dates and requirements will prevent public safety licensees from adding critical capacity and coverage for existing systems, locking them into current channels and equipment supplies, or forcing them to expend scarce resources to replace prematurely their entire radio systems. Therefore, the rules must be modified to ensure that, pending the final conversion date, public safety agencies will continue to have the necessary flexibility to modify and add to their radio systems to accommodate changing public safety operational requirements.

**Note:** The Petition for Reconsideration was filed with the FCC on August 18, 2003. You may submit a letter to the FCC stating your concerns and comments regarding the petition. APCO has posted a full copy of the Petition on the APCO/AFC Web site under the RF Spectrum Issues area located directly at the following URL: <http://www.apco911.org/frequency/issues.htm>

### **Key Issues to Include**

**-Public safety licensees must be able to expand existing systems with compatible equipment.** The current deadline of January 13, 2004, for the FCC to accept applications to modify existing 25 kHz systems will prevent public safety licensees from adding critical capacity and coverage for existing systems. Such modifications should be permitted until January 1, 2013, to coincide with a final complete migration deadline

**-Restrictions on new applications must not inhibit interoperability.** The current rule prohibits any new system applied for after January 13, 2004, from operating with 25 kHz equipment. There needs to be an exception to that rule to accommodate new systems that must maintain interoperability with existing 25 kHz-only systems.

**-Restrictions on equipment certification, manufacturing, and importation should coincide with restrictions on licensees.** The current rule will make it impossible for many state and local governments to add capacity or replace broken and worn-out radios after 2008, when 25 kHz capable radio will no longer be allowed to be manufactured or imported. That date should be extended to January 1, 2013, to coincide with a final complete migration deadline.

**-The Commission Must Permit 25 kHz Bandwidth Operation for Mobile Data and Equivalent Voice Paths.** TDMA and other multi-bandwidth mode equipment can provide important efficiencies for certain types of public safety radio systems. Mobile data systems also provide critical functionality to modern public safety communications operations, but generally require wideband (25 kHz) channels and are consistent with maximum spectral efficiency. The FCC should continue to allow such operations, so long as efficiency guidelines are met.

*You can voice your concern by sending a letter to the FCC in the following format:*

*[Agency letterhead]*

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

RE: WT Docket No. 99-87/RM-9332

Dear Ms. Dortch:

I *[or name of agency]* would like to express my *[its]* support for the petition for reconsideration filed by the Association of Public-Safety Communications Officials (APCO) and other public safety organizations in the above-referenced proceeding regarding mandatory migration to narrowband operations on land mobile radio systems in the VHF High Band (150-170 MHz) and UHF (421-512 MHz) frequencies.

*[in your own words, describe your concerns with the FCC's new rules and why you support the petition for reconsideration.]*

Respectfully submitted,

*[name of agency]*

By: \_\_\_\_\_  
*[TYPE NAME AND TITLE OF  
SIGNATORY]*

*[DATE]*

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The letter can be filed on the Internet through the FCC's Electronic Comment Filing System (ECFS). Go to [http://gulfoss2.fcc.gov/prod/ecfs/upload\\_v2.cgi](http://gulfoss2.fcc.gov/prod/ecfs/upload_v2.cgi) , and fill out the "cover sheet" using "99-87" as the proceeding number. Your letter can be attached as a PDF, Word, or WordPerfect file.

Should you have any questions regarding the process for filing comments, contact Robert Gurss, APCO's Director of Legal and Government Affairs, at (202) 833-3800 or [gurssr@apco911.org](mailto:gurssr@apco911.org).

Questions regarding the narrow band issue can be addressed to [afc@apco911.org](mailto:afc@apco911.org).