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August 14, 2014

The Honorable Tom Wheeler
Chairman
Federal Communications Commission
Washington, DC 20554

RE: PS Docket No. 13-87

Dear Mr. Chairman:

We understand that the Commission has, or will soon have, before it a proposed order in the above-referenced proceeding concerning 700 MHz narrowband public safety radio spectrum. We urge the Commission to proceed quickly to adopt an order in this proceeding to avoid unnecessary and wasteful expenditures of scarce public resources.

The Commission's current rules require that public safety licensees in the 700 MHz narrowband spectrum convert their radio systems to 6.25 kHz operation by December 31, 2016. Related restrictions on equipment manufacturing, marketing and importation will be effective at the end of 2014. However, nearly all of the comments filed in this proceeding strongly supported the need to eliminate, or at least extend, those deadlines. The immediate problem is that, absent a rapid Commission decision, many public safety agencies will be forced to begin the extraordinarily expensive and time-consuming process of replacing their existing equipment in an attempt to meet the current deadline. That would be a terrible waste of public resources, as most radios currently used in the band are relatively new and still have many years of useful life before reaching normal equipment replacement cycles.

There should be little or no controversy regarding the substantive issues in this proceeding. However, further delay in Commission action would cause major hardships for state and local government public safety agencies. Therefore, for the reasons discussed above and in the record, we urge the Commission to move quickly to issue an order in this proceeding.

Thank you for your consideration.

Respectfully submitted,

John Wright
President

cc: All Commissioners
Rear Admiral David Simpson (Ret.)