

PSCC - Public Safety Communications Council

Members: AASHTO, APCO, FCCA, IMSA

July 30, 2002

D'Wana Terry
Chief, Public Safety and Private Wireless Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 Twelfth Street, S.W., Room 3-C252
Washington D.C. 20554

Re: Public Safety Coordinator Plan for VHF/UHF Interoperability Channels
Management and Nationwide Use

Dear Ms. Terry:

During the recent Coordinator Summit Meeting called by the FCC on July 9, 2002; discussions ensued regarding the subject of the four Public Safety coordinators jointly developing an interoperability plan for the management and national use of specific VHF and UHF channels. The Public Safety Coordination Council (PSCC) consisting of AASHTO, APCO, IMSA/IAFC, and FCCA jointly and with full consensus request the FCC review certain portions of the FCC's language in the referenced document, the ***Third Memorandum Opinion and Order and Third Report and Order***, FCC Document number 00-348 of WT Docket No 96-86,

The FCC has stated in the ***Third Memorandum Opinion and Order and Third Report and Order***, at paragraph 90: "*We envision that the four coordinators would jointly develop an interoperability plan regarding the management and nationwide use of these interoperability channels.*" With that statement, the Commission indicates its understanding and expectation that the four public safety coordinators will develop management and usage plans applicable nationwide for the use of those channels newly allocated for interoperability use in the VHF 150 MHz band, and UHF 450 MHz band listed in 47 CFR 90.20 with limitations (d)(80), (81), (82), and (83).

The PSCC applauds the efforts of the FCC to establish specific frequencies in these bands for interoperability and establishing technical rules for assignment of these designated interoperability channels, however, the collective members of PSCC do not believe they are in a position to develop operational and management guidelines for these channels. The PSCC believes that while all members of the PSCC are capable of processing applications for assignment of these specific channels under the new rules of 90.20, these are technical licensing considerations.

The actual operational and management use of these frequencies should be integrated with other interoperability efforts including national initiatives and local or regional planning efforts. Final use will vary greatly region by region dependent upon local protocol, general frequency usage, and local cooperation. The members of the PSCC

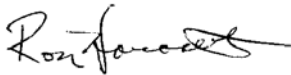
neither individually nor collectively have the resources to establish a national consensus creating operational guidelines for these channels.

The PSCC recommends management and operational guidelines for these specific frequencies be considered and integrated along with other identified interoperability frequencies in the 700 MHz band, existing 800 MHz interoperability channels, the channels from the VHF Maritime so designated for Public Safety interoperability (Channels 25 and 84, or Channels 25 and 85 in the thirty-three inland VHF Public Coast areas), and certain interoperability channels that have been identified by the NTIA for interoperability with the federal level. Any operational and management planning should include all of these channels inclusively to better coordinate future assignment and use.

There is an avenue that has been previously identified to help implement management and operational guidelines for interoperability. In the ***Third Memorandum Opinion and Order and Third Report and Order***, paragraph 90; the Commission continued on in its statement “*This plan could be developed in concert with the group(s) tasked with administering the interoperability channels in the 700 MHz band.*” The members of PSCC agree with the Commission on that statement and recommend the NCC along with the NCC subcommittees include and integrate all identified interoperability channels in ongoing activities associated with interoperability frequencies in the 700 MHz band. The NCC and regional SIECs (State Interoperability Executive Committees) are a much better vehicle for developing the much needed management and operational guidelines for the use of the interoperability channels.

The PSCC recommends the Commission charge the NCC with the task of including all of the interoperability channels identified in the previous paragraph in the NCC’s deliberations and planning efforts associated with providing guidelines for state and regional interoperability planning. The PSCC, through its ongoing participation and membership in the NCC, pledges its support and will back such action as participants of the NCC process.

Sincerely,



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