

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

**In the Matter of:** )  
 )  
**Improving Public Safety Communications** )  
**in the 800 MHz Band** ) **WT Docket No. 02-55**  
 )  
**Consolidating the 900 MHz Industrial/Land** )  
**Transportation and Business Pool Channels** )

To: The Commission

**COMMENTS OF  
THE INTERNATIONAL ASSOCIATION OF FIRE CHIEFS, INC.  
AND  
INTERNATIONAL MUNICIPAL SIGNAL ASSOCIATION**

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## EXECUTIVE SUMMARY

The International Association of Fire Chiefs, Inc. (IAFC), and the International Municipal Signal Association (IMSA) strongly support the Commission's efforts to resolve the interference to public safety systems operating at 800 MHz from Commercial Mobile Radio Systems (CMRS). Before adopting a band restructuring plan for the 800 MHz band, however, IMSA/IAFC urge the Commission to conduct empirical research to determine the effectiveness of the band restructuring plans under consideration. The cost and potential disruption to public safety communications arising out of any of the proposals for restructuring the band are too substantial to risk proceeding on a trial-and-error basis.

IAFC/IMSA further suggest that the Commission evaluate and consider, in lieu of restructuring the 800 MHz band, "swapping" the spectrum of the cellular-style licensees operating in the 800 MHz band giving rise to the interference to public safety systems for the spectrum allocated to public safety, but not yet implemented, at 700 MHz. This would provide frequency separation between public safety and CMRS operations, and would place the responsibility for and burden of relocating on the parties generating the harmful interference.

In developing a solution to the CMRS-to-public safety interference problem, IMSA/IAFC respectfully urge the Commission to be guided by the following principles:

- Assure adequate spectrum to meet public safety communications needs;
- Eliminate harmful interference to public safety systems;
- Minimize disruption to public safety and other licensees with regard to spectrum relocation and system replacement, and
- Avoid cost impact on public safety licensees for relocation expenditures.

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The International Municipal Signal Association (“IMSA”) and The International Association of Fire Chiefs, Inc. (“IAFC”), by their attorney, respectfully submit their comments in response to the Notice of Proposed Rulemaking (“NPRM”) issued by the Commission looking toward resolution of interference experienced by public safety communication systems operating in the 800 MHz frequency band.<sup>1</sup>

**I. STATEMENT OF INTEREST**

IAFC is a voluntary, professional membership society. Its membership, comprised of approximately 12,000 senior Fire Service officials, is dedicated to the protection of life and property throughout the United States and abroad. IAFC is the major national professional association representing the interests of senior management in the Fire Service. The Fire Service is the largest provider of emergency response medical services (“ERMS”) in the United States.

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<sup>1</sup> 67 Fed. Reg. 16351 (April 5, 2002).

IMSA is a non-profit organization dedicated to the development and use of electrical signaling and communications systems in the furtherance of public safety. IMSA members, numbering almost 9000, include representatives of federal, state, county, city, township and borough governmental bodies, and representatives of governmental bodies from foreign nations. Organized in 1896, IMSA is the oldest organization in the world dedicated to activities pertaining to electrical engineering, including the Public Safety use of radio technology.

IMSA/IAFC jointly are recognized by the Commission to coordinate the Public Safety pool frequencies below 512 MHz and at 700 and 800 MHz, as well as the designated Fire and Emergency Medical frequencies.

## **II. INTERFERENCE TO PUBLIC SAFETY SYSTEMS**

The Commission, to the best understanding of IAFC/IMSA, has well described the nature and root causes of the interference experienced by 800 MHz band public safety operators. As described by the Commission, the environment contributing to the interference to public safety systems entails a dynamic interplay of as many as four different factors.<sup>2</sup> Considering the mobile nature of public safety communications and the dynamic growth experienced by the Commercial Mobile Radio Service (“CMRS”) industry, the interference being experienced by public safety agencies is not static in any given area, and its severity is increasing.

The Commission is absolutely correct in its conclusion “that CMRS interference to public safety systems presents a sufficiently serious problem that a solution must be found.”<sup>3</sup> The public safety agencies must have effective, interference-free communications capability each hour of every day throughout their areas of responsibility. To the extent that CMRS operations

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<sup>2</sup> See NPRM at paragraph 15.

<sup>3</sup> *Id.* at paragraph 16.

cause interference to public safety communications systems, that interference impedes and frustrates the ability of the fire, emergency medical and law enforcement public safety agencies to respond. Moreover, to the extent that the interference problems required remediation eight months ago, those needs have multiplied since September 11, 2001. The events of that day demonstrated the demands on the public safety response systems and their supporting infrastructures. A disaster, whether of natural forces or man-made in origin, taxes communications capabilities, not only of the public safety systems but also of the commercial systems. The Commission is to be commended for undertaking a thorough and aggressive approach to identifying and eliminating the interference to public safety communication systems.

### **III. RESOLVING CMRS INTERFERENCE TO PUBLIC SAFETY SYSTEMS**

#### **A. Band Restructuring**

##### **1. Criteria**

The Commission expresses that its goals in this proceeding are to reduce or eliminate interference to public safety communication systems, and to do so with the minimal burden to existing licensees.<sup>4</sup> The Commission also seeks to assure the “provision of sufficient spectrum for public safety.”<sup>5</sup> IMSA/IAFC concur with the Commission’s goals, and add a fourth prong to the test. IAFC/IMSA state their governing principles, as follows:

- Assure adequate spectrum to meet public safety communications needs;
- Eliminate harmful interference to public safety systems;
- Minimize disruption to public safety and other licensees with regard to spectrum relocation and system replacement, and

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<sup>4</sup> *Id.* at paragraphs 20, 26.

<sup>5</sup> *Id.* at paragraph 26.

- Avoid cost impact on public safety licensees for relocation expenditures.

These principles are further discussed in responding to the issues posed by the Commission in the NPRM.

## 2. Proposals for Band Restructuring

The Commission invites comments on proposals advanced by the National Association of Manufacturers, Nextel and its own alternative for restructuring of the 800 MHz band.

Additionally, other proposals have been publicly advanced, including those by UTC, Southern LINC, Cingular and Ralph Haller. IMSA/IAFC commend the parties who have developed each of these proposals. IAFC/IMSA respectfully submit, however, that consideration of any of these proposals is premature.

Each of the proposals advanced represents a good faith effort to address the CMRS-to-public safety interference problem, based upon the proponent's understanding of the nature of the problem and certain value assumptions. As recognized by the Commission, however, there are multiple causative factors to the interference problem, some of which may entail an interplay between factors (*e.g.*, front end receiver overload coupled with intermodulation interference). Neither the public safety community, the Commission, the other interested and affected parties nor the public at large can afford to embark upon a band restructuring proposal which will cost well in excess of One Billion Dollars and entail substantial disruption to communications system operation, however implemented, without assurance that the plan adopted in fact constitutes a solution to the interference problem. To that end, IMSA/IAFC urge the Commission to direct its Laboratory to conduct empirical research to determine the relative effectiveness of the solutions proposed, and to recommend the adoption of a plan which will meet the objectives set by the Commission of solving the interference problem, with minimal disruption and assuring adequate

spectrum for public safety communications. The process adopted by the Commission to study solutions to the interference problem should involve representatives of the various user interests. Until the Commission can, with full confidence, determine that the plan to remediate the interference will, in fact, achieve its objectives, the Commission cannot adopt a major band restructuring plan, whether proposed by itself or one of the interested parties.<sup>6</sup> Only through empirical analysis can the Commission determine how much separation is needed between public safety and CMRS cellular architecture to prevent harmful interference.

If restructuring of the 800 MHz band as proposed by several parties is the solution to the CMRS-to-public safety interference problem, the Commission must understand that the process is complex, burdensome, expensive and time consuming. Motorola has provided IAFC/IMSA and other parties with its assessment of the cost of the rebanding proposals of Nextel and NAM. Its cost estimate included logistics, retuning services, equipment replacement as applicable, system integration, program management, engineering and testing. Motorola estimates that even with public safety remaining in the 800 MHz band, approximately 30-40% of the mobiles and portables could not be retuned and therefore would need to be replaced. The estimated cost to retune public safety systems and replace mobiles and portables as needed alone would amount to more than \$1.05 billion, utilizing 2002 prices. Since this process could not be implemented for several years, this cost estimate is subject to inflation. In addition to the cost are the considerations relating to the need for sequential movement of licensees, and for maintaining fully operative communications systems during the transition, including funding and maintaining

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<sup>6</sup> See discussion at IV, Complimentary Solutions, *infra*. If no realignment will serve to eliminate the interference, as some parties suggest, or if the cost of elimination is absolutely prohibitive, the Commission then must determine what measures are effective to minimize the interference to a level which does not disrupt public safety communications.

duplicative communications until the transition is complete. The latter is no small logistical requirement, and no small burden on public safety users.

### 3. Non-Relocation Alternatives

The Commission further has inquired whether non-relocation alternatives may exist to resolve the interference problem, including frequency coordination and prescription of receiver standards. Frequency coordination is not the answer. Public safety communications systems must be designed to meet geographic area coverage requirements. CMRS operations are licensed by geographic area, with full flexibility accorded to the license authority to locate, relocate and add transmitter sites. Imposing frequency coordination restrictions on CMRS may be deemed to be a limitation of the license authority, and frequency coordination for public safety licensees which takes into account CMRS stations can only be conducted according to a snapshot-in-time basis. Consequently, any change in the CMRS station locations, transmitting power, antenna height or number of transmitters could serve as a catalyst to cause or increase harmful interference. Any such change in the CMRS stations therefore would vitiate the benefit of the frequency coordination determination. It would be unavailing for the Commission to attempt to prescribe a “solution” based upon static parameters in a dynamic environment. Nor would the promulgation of receiver standards provide the solution. Intermodulation interference is not a result of receiver design, but rather occurs due to the interaction of transmitted signals and receiver functioning. Receiver standards to address intermodulation interference, in any event, only addresses one of the underlying causative factors; and receiver replacement would require decades.

With regard to narrow-banding of equipment if services are relocated, IAFC/IMSA respectfully submit that narrow-banding should be required only if the relocation requires replacement of equipment. To the extent the band restructuring permits re-tuning of equipment,

the Commission should not require narrow-banding, since to do so would be in conflict with the Commission's principle of minimal disruption – a factor which entails avoidance of costs other than those necessary to implement the band relocation plan.

#### 4. Other Approaches

Another approach for consideration by the Commission entails “swapping” the 24 MHz of public safety spectrum at 700 MHz for the 800 MHz spectrum of the cellular-style CMRS operators. Nextel, the primary cellular-style CMRS operator in the 800 MHz band, reports that it holds an average of 19 MHz of spectrum at 800 MHz.<sup>7</sup> This spectrum is not evenly distributed throughout the country, and would need to be examined to determine equivalency from a swap perspective. Presumably, however, Nextel enjoys its largest frequency blocks in the major markets; and it is in these major metropolitan areas where public safety has the most pressing communications needs.

Assuming that a swap as described above provides adequate replacement spectrum for both public safety and CMRS operators,<sup>8</sup> this concept has many attractive features. First and foremost, there would be no cost and no disruption to public safety licensees. Only those parties creating the interference environment would relocate. Second, public safety would receive the vacated 800 MHz channels; and those would be in the 800 MHz band where public safety now

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<sup>7</sup> This is comprised of both SMR channels and business/industrial/land transportation channels converted to SMR operation.

<sup>8</sup> Based on the 19 MHz Nextel figure and the 24 MHz public safety allocation, there is an obvious 5 MHz difference. Whether a major market-by-major market analysis would produce this same differential is yet to be seen. Moreover, this does not take into account license authority which may be held by other CMRS operators functioning in a cellular-style mode. If there is a material difference, the Commission would have several alternatives available to handle the “excess” 700 MHz spectrum. These include (i) retain for public safety, (ii) license to the CMRS operators in consideration for their relocation (e.g., pro rata to their licensed spectrum in any given area), or (iii) auction to CMRS operators. Pending further determination of the size and nature of any such “excess”, IAFC/IMSA do not at this point take a position on the disposition of any such “excess” 700 MHz spectrum.

operates. Equipment is readily available, and operations would be easily integrated.<sup>9</sup> Third, there would be no “musical chairs” entailing relocation by successive parties moving out of and into the same spectrum. Fourth, there would be no reimbursement requirement, process or mechanism. This would moot a significant legal and policy issue for the Commission, as well as a potentially complex administrative process.<sup>10</sup> Fifth, in contrast with the Cingular approach, there would be no adverse budget impact, since the 700 MHz public safety spectrum is not subject to auction.<sup>11</sup> Regarding implementation, this plan would require Congressional authorization; and that legislation would constitute an appropriate vehicle to mandate a firm transition date for broadcasters to vacate television channels 60-69. Furthermore, to avoid a repeat of the current experience, the Commission would need to bar any new cellular-style operation on the interleaved 800 MHz band channels.

#### B. Additional Spectrum For Public Safety Agencies

The Commission is well aware, based upon the report of the Public Safety Wireless Advisory Committee (“PSWAC”), that the spectrum available for public safety services is not adequate. Moreover, the spectrum actions identified by the Commission in the NPRM do not or will not satisfy the public safety communications needs. Beyond the fact that the 24 MHz allocation at 700 MHz does not satisfy the needs identified in the PSWAC report, there is no effective timetable for broadcasters to vacate the 700 MHz band, so to permit occupancy by public safety systems. Moreover, as detailed to the Commission in prior proceedings, that spectrum is designed to meet future and additional communications needs, not to replace existing

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<sup>9</sup> Hopefully, much of the 700 MHz implementation planning process could be applied to such new 800 MHz band channels. Even if only a small portion could be applied, however, the cost of the loss of that work effort must be weighed against the monetary cost and disruption entailed in rebanding at 800 MHz.

<sup>10</sup> See discussion at III.D. and III.F., *infra*.

<sup>11</sup> Potentially, as discussed in Note 8, *supra*, there could be a positive auction impact.

systems. The 4.9 GHz allocation will provide a home only for short-distance, broadband communications, not to meet the needs for the local and regional communications provided by 800 MHz band systems. Introduction of narrow-band digital technology and a potential to re-farm 800 MHz are, at best, long-term opportunities. As the Commission well is aware from the re-farming of spectrum below 512 MHz, the re-farming process is expensive and extremely slow to implement. Finally, none of these actions provides additional spectrum below 512 MHz to accommodate those public safety interests, including the small, suburban and rural fire, ERMS and other public safety agencies, which cannot meaningfully employ a large trunked system.

To the extent the resolution of the CMRS-to-public safety interference problem provides an opportunity to increase the spectrum available to public safety services, that opportunity should be seized upon by the Commission. In this regard, Nextel is to be commended for suggesting an increased allocation to the public safety services as part of its plan to resolve the interference problems. Notwithstanding, however, resolution of the interference problems and satisfaction of the public safety needs for additional spectrum must be treated as separate objectives. Resolution of the 800 MHz interference problems should neither be denied, delayed nor compromised in an effort to meet the additional public safety spectrum requirements. Pursuit of the optimum should not be allowed to defeat the opportunity to achieve substantial and meaningful improvements.

The Commission inquires whether the 800 MHz database is sufficiently accurate to permit reassignment of licenses. IMSA/IAFC respectfully submit that the 800 MHz database is the most accurate of any of the public safety licensee databases. IAFC/IMSA believe the 800 MHz database is fully adequate to permit license reassignment.

### C. Interoperability Channels

In addition to the five NSPAC interoperability channels, additional interoperability channels at 800 MHz would be helpful, particularly for on-scene operations. The Commission recently concluded a process to prescribe a modulation protocol for interoperability channels at 700 MHz, and there should be no need to replicate that process.

### D. Incumbent Relocation

As set forth above in discussing the band restructuring proposals, any of the incumbent relocation proposals discussed in the NPRM is inherently complex. The means to implement such a proposal would be dependent upon the option selected based on the outcome of analysis to determine the efficacy of the relocation plans. With regard to any band reconfiguration, IMSA/IFAC respectively submit that the concept of secondary business/industrial/land transportation/SMR operations appears to be impractical. The essence of secondary status is the obligation to terminate operation if harmful interference is caused to the primary operator. For the primary operator, each of the requisite elements of knowing, contacting, and securing the cooperation of the offending secondary user is problematical in an emergency situation. Indeed, as observed by the Commission, secondary users may themselves be operating critical infrastructure systems which are affected by the situation giving rise to the instant emergency, or otherwise may be carrying third-party communications arising out of and related to the emergency situation. It seems unlikely that secondary status would be acceptable to many of the non-public safety users, or that public safety itself could tolerate the risk of harmful interference arising out of the inability to secure termination of secondary operations.

Regarding relocation costs, as reflected in the Nextel plan public safety users should not be subject to any cost burden from incumbent licensee relocation. As the Commission has observed, the harmful interference environment has developed with the proliferation of cellular-

style CMRS systems in the 800 MHz band in close geographical proximity to public safety systems. Cellular-style architecture within the interleaved channels was not contemplated when the band originally was allocated and sub-divided between public safety, business/industrial/land transportation and SMR use. Those responsible for the interference environment should be held accountable, at least to the public safety licensees, for the remedial measures required to remedy the harmful interference.<sup>12</sup>

The costs subject to reimbursement include equipment replacement (not upgrade), site relocation, re-tuning, administrative, frequency coordination, engineering, testing and legal expenses.<sup>13</sup> The costs subject to reimbursement should be all costs reasonable and necessary to achieve the relocation, without artificial limits and conditions.

The program to reimburse public safety users of any relocation costs must be carefully designed to be comprehensive, fair, efficient and fully accountable. IAFC/IMSA recommend that the Commission establish a third party administrator to handle receipt of funds, process requests for reimbursement and disburse funds. Standards for reimbursement of all relocation costs as described above must be established by the Commission. Parties applying for reimbursement should be required to document their requests, including providing, as necessary, both technical justification and certification of the inventories of the equipment being displaced. Disputes between the applicant and the administrator with regard to approval of reimbursement requests

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<sup>12</sup> “(d) Communications involving the imminent safety-of-life or property are to be afforded priority by all licensees. (e) Licensees shall take reasonable precautions to avoid causing harmful interference. This includes ... and such other measures as may be necessary to minimize the potential for causing interference.” 49 C.F.R. 90.403.

<sup>13</sup> Subject to congressional authorization, it would be appropriate for any fees obtained from auctioning “recovered spectrum” to be used to pay the cost of relocation, in offset to the costs otherwise chargeable to those responsible for the interference environment. IAFC/IMSA, while supporting the concept advanced by the Commission (NPRM at paragraph 47) have difficulty understanding the source and nature of the “recovered” spectrum, inasmuch as it is understood from the various plans advanced, other than that advocated by Cingular, that any relocation within the 800 MHz band would entail a frequency swap and therefore would not contribute to the recovery of spectrum eligible for auction. Relocation to 700 MHz, if feasible, could lead to the recovery of spectrum for auction, beyond that which is needed for a 1-to-1 replacement for those parties remaining at 800 MHz.

should be resolved through appeal to a management structure overseeing the administrator, comprised of representatives of the affected user communities.

E. Primary versus Secondary Status

*See Discussion supra* under Section D, Incumbent Relocation

F. Implementation Schedule

Pending Commission identification of a program determined to be appropriate to resolve the harmful interference environment, including whether that program entails in-band or out-of-band frequency swaps and, in either case, equipment replacement, any effort to provide a timeframe to implement relocation would entail sheer speculation. The nature of the relocation, the sequencing with regard to licensees abandoning incumbent channels so that other licensees can move into those channels, the availability of equipment, site impacts, and the reimbursement process are all factors that will impact upon the relocation schedule.

Special mention is warranted regarding the effect of the reimbursement process on spectrum relocation. Even with a reimbursement program, public safety agencies, unlike commercial firms, generally are not in a position to advance significant sums of monies which may be required for the spectrum relocation, only to be reimbursed at a later date. Governmental agencies providing public safety services operate with appropriated funds collected through the jurisdiction's taxation system. Consequently, to the extent the reimbursement authority can be funded in advance, and can provide funding to meet the public safety agency's billing and payment cycle, or otherwise to provide direct payment to vendors for major component costs, the process of relocation will be greatly expedited.

Nextel proposed a phased implementation schedule, involving relocation first of those suffering acute interference and subsequently according to market size. This is a sensible

approach. In any such phasing process, however, there must be assurance that funding is available to reimburse the final party or parties to relocate.

#### G. Frequency Coordination

The Commission invites comment on whether such frequency coordination as will be required could be satisfactorily performed by those presently certified as frequency coordinators, or whether the Commission should certify a “super coordinator” to oversee restructuring of the 800 MHz band.<sup>14</sup> IMSA/IFAC respectfully submit that the current frequency coordinator system works effectively, and should be utilized in the 800 MHz relocation process. In the public safety services the coordinators work independently to coordinate frequency assignments on the pooled channels below 512 MHz and in the 800 MHz band. Prompt notification of new frequency assignments and communication between and among the coordinators works in a satisfactory fashion to avoid problems. There is no reason why this system can not be utilized for 800 MHz relocation. Nor is there any reason why the burden of attempting to establish a formal “super coordinator” structure need be undertaken, or imposed upon the public safety community.

The Commission invites commenting parties to describe how the coordinators would (a) designate new assignments in the Public Safety Block that would reduce or eliminate CMRS interference, and (b) ensure that incumbent licensees receive modified licenses that are geographically and spectrally equal to or better than their original licenses.<sup>15</sup> As discussed regarding Band Restructuring above, IAFC/IMSA respectfully submit that it is not the responsibility of the frequency coordinator to engineer frequency assignments to reduce or eliminate CMRS interference. That is the function of the relocation plan to be adopted by the Commission. Also as previously discussed, frequency coordination cannot address interference

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<sup>14</sup> NPRM at paragraph 68.

from the CMRS environment over which the coordinator has no responsibility, and which in any event could change the day after the coordination is issued or immediately after the public safety equipment is installed in accordance with the station location flexibility accorded to CMRS licensees. Nor can the coordinators assure that new assignments both geographically and spectrally are equal to or better than the original licenses. The function of the coordinator is to assign the best available frequency taking into account co-channel and adjacent channel assignments within the allocated public safety band. Coordinators cannot assure a comparative level of radio system performance.

With regard to the relationship of the coordinators and the Regional Planning Committees at 700 or 800 MHz, the coordinators would have the same relationship as currently exists. Once the utilization plan is established by the RPC, a frequency coordinator selects the best available channel based upon co-and adjacent-channel interference evaluation. The RPCs, consistent with their present responsibilities, would be helpful in resolving assignment conflicts between bordering regional areas.<sup>16</sup>

#### **IV. COMPLEMENTARY SOLUTIONS**

The Commission invites comment on various approaches it describes as “complementary solutions.” IMSA/IAFC already have commented on the issue of receiver standards.<sup>17</sup> With regard to issues of CMRS transmitter guard bands or signal strength and the necessary level of public safety signal to mitigate against cellular-type architecture, these engineering considerations should be addressed in the study IAFC/IMSA call for above. With regard to

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<sup>15</sup> NPRM at paragraph 71.

<sup>16</sup> The “band manager” plan suggested by the Commission (NPRM at paragraph 71) may have applicability in the business/industrial/land transportation frequency pool. As a commercial licensing technique, the band manager plan has no applicability to licensing in the public safety radio services.

<sup>17</sup> See Discussion of Band Restructuring, *supra*.

whether the Commission first should require band reconfiguration and, if not completely successful, then look to receiver and/or transmitter standards,<sup>18</sup> IMSA/IAFC respectfully submit that the cost and administrative burdens and the potential disruption to public safety communications during a period of transition are too substantial to risk any remedial program in whose effectiveness the Commission does not have full confidence. The prospect of spending well in excess of one billion dollars to try a solution which may or may not work is not acceptable. As pressing as the need is to address the CMRS-to-public safety interference environment, the answer does not lie in adopting a solution for the sake of taking action without full confidence in the merits of the plan adopted to resolve the interference. The posing of this issue in the NPRM demonstrates the need for the Commission to conduct the type of empirical research describe in Section III.A. above.

## **V. SUMMARY AND CONCLUSION**

The Notice of Proposed Rulemaking constitutes a productive first step in addressing the CMRS-to-public safety interference problems. It is evident from the NPRM, however, that while many of the issues involved in resolving the problems can be identified, there is an inadequate technical basis to warrant progressing, at this time, with adoption of any remedial plan. Further engineering analysis must be conducted in order to provide the Commission, and the user communities, with full confidence that any plan adopted has a very high probability of success to eliminate the interference environment. Only then can the Commission progress with adoption of a plan, including a program to impose financial responsibility necessary to relieve public safety agencies of the cost burdens of rectifying a situation not of their making, to resolve the harmful interference environment.

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<sup>18</sup> NPRM at paragraph 79.

WHEREFORE, THE PREMISES CONSIDERED, The International Association of Fire Chiefs, Inc. and the International Municipal Signal Association respectfully urge the Federal Communications Commission to proceed with the empirical analysis described above, and otherwise to adopt polices, procedures and provisions consistent with the views set forth herein.

Respectfully submitted,

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