

The County of Orange ("County") is located in the densely populated coastal area of Southern California, bordered by Los Angeles County on the north, San Diego County on the south, Riverside and San Bernardino Counties on the east, and the Pacific Ocean on the west.

The County operates its 800 MHz Countywide Coordinated Communications System ("800 MHz CCCS") in support of over one hundred Public Safety departments and agencies within the County and its thirty-four incorporated cities, serving a population of nearly 3,000,000 permanent residents plus a significant tourist population.

The County's 800 MHz CCCS continues to receive interference from the wireless communications carriers operating in the 800 MHz band: AT&T Wireless Services (A-Band Cellular), Nextel, and, to a lesser extent, Verizon Wireless (B-Band Cellular). While significant progress has been made through the cooperation of these wireless carriers, this interference continues to be experienced, especially when new wireless communications carrier sites are deployed as well as when their periodic frequency changes are effected. This is in spite of meeting all of the recommendations in the "Best Practices Guide," in that there is simply not enough intermodulation rejection available in current state-of-the-art subscriber unit receivers to prevent receiver intermodulation.

The County enthusiastically received the Nextel "white paper" proposal as a positive step towards mitigation of the interference to Public Safety 800 MHz systems, as well as the proposed increase in 800 MHz Public Safety spectrum. However, after reviewing the Reply Comments of the "Joint Commenters" and its "Consensus Plan," as requested by the Commission in its Public Notice of September 6, 2002, the County firmly believes that the "Consensus Plan" will be more easily implemented since no current licensee will "lose" any of its current spectrum. The County urges the Commission to give serious consideration to the "Consensus Plan" proposed by the "Joint Commenters" as a viable mitigation effort.

It is also imperative that the Public Safety community not be encumbered with the costs of retuning/channel changing. The County is just finishing the deployment of its 800 MHz CCCS at a cost to the County and its partnering Cities of over \$100 million, and is not in a position to spend more for interference mitigation. Such additional expenditures to resolve this interference would be ill-timed and a burden. The County urges the Commission to designate methods for adequate funding for any changes it approves to mitigate interference to Public Safety.

Since the County foresees that some level of interference to Public Safety communications systems from the 800 MHz wireless communications carriers will still exist, the County further urges the Commission to mandate the serious cooperation of these wireless carriers in the resolution of interference to Public Safety systems.

The County does not have any comments on other alternative proposals.

The County also firmly believes that the Public Safety community is still in need of additional spectrum in light of the delays anticipated in assigning the new 700 MHz spectrum in major

metropolitan areas such as the Los Angeles Metropolitan Area.

Respectfully submitted by:

Gary David Gray, P.E.
Chief Telecommunications Engineer