

Comments of the Washington State Interoperability Executive Committee
Pursuant to WT Docket No. 02-55

In the Matter of)
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)
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)
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In response to a request for public comments due on September 23, 2002, the Washington State Interoperability Executive Committee (SIEC) respectfully submits that its membership supports the concepts as put forth in Docket No. 02-55.

The SIEC, however, does have concerns regarding Docket No. 02-55 and encourages the Federal Communication Commission in due diligence to address the concerns captured below.

The purpose of the SIEC is to pursue the goal of statewide wireless interoperability. The SIEC represents state agencies and a number of local government agencies in Washington state as defined in the attached document.

I. Canada

The consensus plan has yet to address relocation and interoperability in any proceedings with Canada. The current treaties and agreements with Canada will impact the implementation of relocation plans for the northern tier states, and may adversely affect interoperability. For example, Canadian interests have incumbencies; therefore, half of the state of Washington cannot use those frequencies, which diminishes spectrum and negatively impacts interoperability for those affected entities. The state of Washington requires at least equal amount of spectrum with regard to this consensus, as well as consideration of Canada and their interests.

II. Costs

There are significantly more costs involved than the actual expenses, which are greater than the \$500 million that Nextel has agreed to hold in escrow for relocation. There are also inherent operational costs to implement relocations for both public and private organizations.

For example, the Washington State Department of Transportation's (WSDOT) conservative estimate is approximately \$1.8 million for labor and equipment. However, the WSDOT questions what the additional cost of the disruption of service and fragmentation of the statewide system will be over a certain period of time (three to four years) that will result in an interruption of the workforce.

With the limited \$500 million held in escrow, Washington state has a concern that the actual cost of conversion far exceeds this dollar amount. Once the \$500 million has been liquidated, Nextel assumes no further responsibility – ultimately the taxpayers will assume the additional liability.

III. Relocation Viability

There are no funds or provisions available to pay the following entities to move to relocation:

- Business and industry land transportation users
- Commercial specializing Mobile Radio Systems
- Large corporations and defense contractors

Overall, the end goal of Docket No. 02-55 is laudable, however, the process to get there will be laborious, time consuming and expensive in terms of operational costs and interoperability.