

BORDER AREA COALITION
SAN DIEGO /MEXICAN BORDER AREA REALIGNMENT IMPACTS

The analysis of the use of the proposed 800 MHz rebanding proposal by the Consensus Group shows the following consequences for the San Diego /Mexican Border Area:

Based on current channel allocations and frequency coordination today, there are not enough channels available to make this work in San Diego. Currently, the number of NPSPAC channels coordinated between the Mexican Border and the 70 mile line are 60 US NPSPAC channels used in a primary status and 47 Mexican NPSPAC channels used in a protected secondary status in the US.

The number of wide area, high site Public Safety channels coordinated at 860.25 – 866.00 is 25. (10 for San Diego City and 15 for San Diego County). San Diego County also needs to coordinate 10 additional channels for Imperial County. There is an additional six channels that have limited coverage and would be easier to identify new channels to coordinate with existing users to the north (Orange and Riverside Counties). All of these channels will also need to be relocated in the 856.00 – 870.25 frequency allocation.

The total number of Public Safety channels for the San Diego/Mexican Border Area that need new US frequency allocations in the proposed spectrum is 91. (101 if you add in Imperial County channels)

When you analyze the proposed frequency spectrum for the San Diego/Mexican Border Area, the number of channels in the 856.00 – 860.25 range, there are 118 channels that are not currently being used by Public Safety. However, usage of these channels in the San Diego area will have to be coordinated with existing Public Safety, B/ILT and SMR users to the north of the 70 mile line. Many of the channels available have current sites located and operating on high sites such as Santiago, Modjeska and Elsinore that will make it difficult to coordinate their usage in San Diego.

Analysis of the available 118 channels that could be re-coordinated for use in San Diego shows that 55-60 could be re-coordinated for use in San Diego once Nextel and non-public safety users leave this allocation. That leaves a gap of 31-36 channels.

The San Diego/Mexican Border Area is not being given the same consideration for a guard band that the rest of the US is being given. If there is a need for 2 MHz of guard band elsewhere, why is only 0.75 MHz being proposed for the San Diego/Mexican Border Area? Shouldn't Public Safety agencies in the border area be afforded the same protection as the rest of the US?

The spectrum allocation for Nextel should be reduced in the San Diego/Mexican Border Area to provide this protection. Nextel should not use channels below 863.00 – allowing

for a 2 MHz guard band from 861.00 – 863.00. This would provide an additional 30 channels that could be considered for Public Safety usage up to 861.00.

It is estimated that an additional 15-20 channels could be gained by eliminating the frequency offset in the San Diego/Mexican Border Area. This offset requires San Diego/Mexican Border Area users to coordinate with two co-channels to the north. Any transmitter operating just north of the 110 km line is likely to eliminate offset channels on both sides from consideration.

In conclusion, in order to make this plan work in San Diego, the following would most likely need to occur:

- All users that could cause co-channel or adjacent channel interference that currently have sites operating on Santiago, Modjeska and/or Elsinore would have to be relocated to other spectrum
- Users that could cause co-channel or adjacent channel interference would need to be licensed in a secondary status with the provision that they would not interfere with Public Safety operations
- All B/ILT in Orange and Riverside Counties would have to be relocated to different spectrum in order to provide enough channels that can make this work in the San Diego/Mexican Border Area
- Orange County Public Safety users would have to be relocated to make enough channels available to make this work in the San Diego/Mexican Border Area
- Nextel would need to provide additional spectrum up to 863.00 MHz in order to provide sufficient channels and guard band protection

Interim Steps:

- A detailed analysis would need to be conducted by APCO and others responsible for frequency coordination of the Southern California/Mexican Border Area. They need to show us how this will work, since we don't think it will
- A detailed analysis should be conducted showing the possible impacts and mitigation strategies needed to address public safety interference to San Diego/Mexican Border Area from sites on Santiago, Modjeska and Elsinore
- Nextel should be required to work on eliminating interference to Public Safety systems
- The State Department should begin to develop a plan that will enable them to successfully renegotiate the current 800 MHz treaty with Mexico – negotiations should focus on getting rid of the offset channel allocations, coordinating mutual aid channels and providing additional 800 MHz spectrum through frequency exchange of VHF and/or other spectrum that could be seen as more desirable by Mexico in the Border Area
- Further analysis should be conducted and solutions provided that encourage non-Public Safety users of the affected 800 MHz band to relocate to other bands such as the 900 MHz spectrum proposed – Nextel should pay for this study and any proposed solutions

San Diego/Mexican Border Area Allocations

	Current	Proposed	Net
Public Safety	84	117	Gain 33
NPSPAC	63 - 25KHz equiv	0	Loss 63
B/ILT/SMR	215	82	Loss 133
CMRS	0	163	Gain 163

San Diego/Mexican Border Area Channel Usage

	Current	Proposed	Net
Public Safety	80	117	Gain 37
NPSPAC	60 US channels 47 Mexican channels	0	Loss 107
B/ILT/SMR	62	82	Gain 20
CMRS	157	163	Gain 6