

BORDER AREA COALITION
CANADIAN BORDER REGION 3 IMPACTS

The Consensus Plan Supplemental Comments recommends spectrum reassignments in Border Region 3 that only benefit AMR systems, specifically Nextel. In spite of one stated objective of this rulemaking being to increase Public Safety spectrum the Consensus Parties are recommending that in Border Region 3 Public Safety receive no spectrum relief at all.

The offered Consensus Plan would make the following channel assignment changes in Border Region 3:

	Today	Planned	Change
SMR	135	177	Increase of 42 Channels
BI/LT	170	128	A decrease of 42 Channels
PS	216	216	No Change
Canadian	198	198	No Change

This amounts to a raid on the spectrum assigned to the Business and Industrial, Land and Transportation eligible by the SMR industry. This is not unlike what the Consensus Plan advocates in other Border Regions.

Another significant impact seen in Border Region 3 is that the Consensus Plan allocation being recommended for BI/LT use is 860.9 to 864.1 MHz while in the adjacent Border Region 7 it recommends the use of 861 MHz and above for exclusive use by Low Site Cellularized SMR. The result of this is that the interference that can be expected by the BI/LT user community would be intense and likely result in their inability to utilize the FCC spectrum they have licensed. For those large organizations such as Consumers Energy Company, a significant portion of their radio network would virtually be rendered unusable. This translates into millions of Michigan residents being affected by degraded utility emergency response capabilities. The recognition that the low site SMR technology systems in place do cause harmful interference is seemingly ignored in making the above recommendation.

Business, Industrial, Land and Transportation systems currently licensed from 859-860 MHz will also experience significant ongoing interference due to the Consensus Plan recommendation that that spectrum be designated as a Guard Band as well as the immediately adjacent Low Site SMR allocation. Any required Guard Band allocation should be located within the offending architecture allocation, i.e. Above 861 MHz.

The Consensus Plan will result in a significant hardship being placed on all BI/LT radio spectrum users while exposing this radio user community to intense ongoing interference, with the resulting benefit realized exclusively by the Low Site SMR industry.