

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Improving Public Safety Communications in the 800 MHz Band)	WT Docket 02-55
)	
Consolidating the 900 MHz Industrial/Land Transportation and Business Pool Channels)	
)	

COMMENTS OF THE CITY
AND COUNTY OF SAN DIEGO

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February 10, 2003

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SUMMARY

The plan set forth in the Consensus Parties Supplement simply will not work in the San Diego area of the Mexican border without re-negotiation of existing bilateral agreements and/or much greater relocation out of 800 MHz for SMR and B/ILT licensees. The channels available to public safety in the heartland are reduced by 50% on the Mexican border. There are not enough frequency pairs to go around. Creating a 2 MHz guard band from Nextel spectrum, to match the 2 MHz protection afforded in the heartland plan, would partly cure the channel deficiency. Removing the frequency offset in the border area would also help, but that again would depend on bilateral re-negotiation.

Two actions need to occur in parallel, and quickly. First, APCO and other responsible frequency coordinators should explain precisely how the CP plan will work. Our analysis says it will not. Second, the FCC and the State Department should begin to develop a plan for bilateral re-negotiation that will make uniform the quantity and quality of Mexican border spectrum in comparison with the realigned heartland.

The technical proposals in Appendix F lack clarity and even-handedness. They ask public safety to bear more than its share of interference mitigation that must continue before, during and after realignment. References to out of band emissions and intermodulation products leave out a third primary mechanism for commercial interference to public safety systems -- high-powered transmitters at low commercial sites. There is no mention of commercial power reduction in the Appendix. Instead, the virtually exclusive focus is on improving public safety signal levels and portable receivers. There is insufficient discussion of how NPSPAC licensees

will be completely and satisfactorily re-coordinated, given the different bandwidths and channel spacing in the spectrum proposed for them.

Based on the needs of the San Diego jurisdictions alone, an \$850 million contribution by Nextel to relocation/retuning expenses -- \$700 million of that to public safety -- may not be enough. The Supplement's answer is unsatisfactory: That no relocation or retuning need begin without a demonstration of money in hand to cover the costs. This only avoids an unfunded liability; it does not address the public safety interference problems that have caused the need to relocate and retune in the first place. San Diego City and County endorse the fuller discussion of funding found in the contemporaneous Comments of the Public Safety Improvement Coalition, to which they belong.

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**COMMENTS OF THE CITY
AND COUNTY OF SAN DIEGO**

The City of San Diego (CITY) and the County of San Diego (COUNTY) hereby comment on the Supplement filed December 24, 2002 in the captioned proceeding by the self-styled "Consensus Parties."¹ ("CP") The City and County represent all public safety radio users (law enforcement, fire and EMS) in the San Diego Region with the exception of the Port of San Diego and National City.² For primary public safety communications, the City 800 MHz network has over 6600 users and the County 800 MHz Regional Communications System ("RCS") has over 9,000 users. In addition, the City network provides communications for over 16,000 total users and the RCS provides communications for over 17,000 total users.

¹ The City and County are members of two coalitions commenting separately today, the Border Area Coalition and the Public Safety Improvement Coalition. Earlier, the County joined Imperial County in filing on behalf of their RCS (Comments of May 6, 2002) and the City filed Reply Comments August 7, 2002.

² See Agency Listings, Attachments 1 and 2 reflecting City and County agencies served.

Background

In a prior submission, the City noted that, under the original CP plan, the San Diego region and other Mexican border jurisdictions would be able to use only half of the spectrum proposed to be reassigned to public safety. San Diego insisted that the border communities be given access to the same quantity of spectrum available to heartland (non-border) jurisdictions. The City also suggested that if restrictions were to be imposed on public safety use of “cellular-like” architectures at 800 MHz, there must be a clear migration path to 700 MHz spectrum. This migration must include assured freedom from broadcast TV interference (notably Channel 69) and completion of any necessary bilateral agreement negotiations with Mexico. (Reply Comments, 2-5)

For its part, the County also called for additional spectrum in the border regions “to compensate for Mexican and Canadian bilateral agreements that give 50% of existing bandwidth to those countries.” (Comments, 2) In addition, the County questioned the ability of local public safety agencies to transition in the near term to 6.25 kHz channel spacing and doubted that the \$500 million contribution to relocation and retuning offered by Nextel would suffice for all the tasks involved. The County suggested “a permanent, renewable source of funding for public safety agencies.” (Comments, 4)

The CP Supplement

A Shortage of Channels. The CP Supplement adds considerable detail to the plan for border areas, but does not and cannot, in its present form, mitigate the sheer channel shortages on the Mexican border. Nothing short of bilateral agreement re-negotiation or greater reassignment of B/ILT and SMR licensees will gain the needed public safety spectrum. The spreadsheet at Attachment 3 illustrates current channel occupancies and availability in the realigned 856-861 segment, of which 2.925 MHz would belong to public safety. (Supplement, App. G, Slide G-2)

A total of 91 public safety channels in the San Diego County/Mexican Border Area would require reallocation under the CP plan.³ Allowing for the three-fourths MHz guard band at the high end,⁴ there are 118 channels in the 856-860.25 range not currently being used by public safety. However, we estimate that only 55-60 of these could be re-coordinated for use in San Diego City and County once Nextel and the other incumbents depart.⁵ This leaves a gap of 31-36 channels.⁶

The following table illustrates the San Diego/Mexican Border Area Allocations pre and post- alignment based upon the CP plan:

Proposed 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
TOTALS	362	362	No Change

³ This leaves out 10 channels San Diego County seeks to coordinate for Imperial County in the RCS. (note 1, *supra*)

⁴ In the heartland, a quasi-guard band at 859-861 would be available for B/ILT and SMR systems considered unlikely to cause interference to public safety. (Supplement, 10)

⁵ A number of public safety, B/ILT and conventional SMR licensees just north of the border area use high sites at Santiago, Modjeska and Elsinore (Exhibit A) that would, in our calculations, preclude coordination for San Diego County of about half the 118 available channels.

⁶ Attachments 3 and 4 analyze the current 800 MHz channel assignments within and outside the 70-mile border zone.

The next table illustrates the San Diego/Mexican Border Area Allocations related to current channel usage:

San Diego/Mexican Border Area Channel Current 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
TOTALS	406	362	Loss 44

As can be seen from these tables, insufficient spectrum will be provided to Public Safety in San Diego as a result of the CP.⁷

Curing the Deficit. The public safety channel deficit could be made up if Nextel were required to provide a 2 MHz Guard Band, as they are in all non-border areas, and be restricted from operating between 861 and 863 MHz in the Mexican border area. This would replicate the 2 MHz protected area for heartland public safety at 859-861. (Note 4, *supra*) With such a safeguard in place, 30 additional channels (the proposed 0.75 MHz Guard Band out of public safety's allocation) could be considered for public safety use up to 861 MHz. Another 15-20

⁷ We rate proposed NPSPAC channels as zero in both tables. Appendix G's Slide G-2 shows a pool of 117 channels for the Mexican Border Re-Allocation. It does not provide any breakdown of NPSPAC vs. conventional public safety channels. Presumably, some of this allocation would be NPSPAC. However, based on the current Mexican bilateral agreement, there is no provision for 12.5 kHz channels in this frequency block - nor is there anything that allows for a mixed use of 25 kHz channels and 12.5 kHz channels within the same block or allocations.

channels could be gained by eliminating the frequency offset in the Mexican border area.⁸ This is because a transmitter operating just north of the 110-kilometer northern boundary of the border area often eliminates from consideration channels on each side of the offset frequency.

Further Relocations and License Changes. Following are expected impacts unless new channels could be found to fill the gap between needed and available channels in San Diego

County:

- All users that could cause co-channel or adjacent channel interference that currently operate on Santiago, Modjeska and 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 licensees in Orange and Riverside Counties would have to be relocated to different spectrum in order to provide enough channels in the San Diego County/Mexican Border Area
- Orange County public safety users would have to be relocated to create enough channels in the San Diego County/Mexican Border Area

Forced relocation of non-public safety users should be a last resort. It would be far better to encourage voluntary moves to other spectrum, perhaps by premium channel inducements at 900 MHz. (Supplement, 13; see also, 10, n.15)

Interim Steps. We don't consider our re-coordination calculations to be the last word on channel availability in San Diego City and County. We welcome, and would expect, APCO and other checks on our analysis. We recommend:

⁸ Presumably requiring Mexican bilateral agreement re-negotiation. Alternatively, our proposed protection zone at 861-863 MHz could be slightly reduced to permit more than the 30 new channels. There are other good reasons for revising the bilateral agreements, including national uniformity for NPSPAC channels, but the process will take time.

- A detailed analysis 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.
- The analysis should show the possible impacts and mitigation strategies needed to address public safety interference to the San Diego County/Mexican Border Area from sites on Santiago, Modjeska and Elsinore Peaks.
- The State Department should begin to develop a plan that will enable them to successfully renegotiate the current 800 MHz bilateral agreement with Mexico. Negotiations should focus on removing the offset channel requirement, 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.

Appendix F

The City and County have conducted a thorough review of Appendix F in relation to the technical merits and the ability of public safety agencies to utilize the standards and procedures presented. There are some sections that require clarification and we are providing them as follows.

Section 1.b. We are unsure about the intended effective date of the technical proposals in Appendix F. Section 1.b is captioned "Post-Alignment Rules" and that is reinforced by the opening sentence of Section 1.2 and by the first sentence of Section 2. Thus, we are puzzled by Section 1.1, captioned "Interference Mitigation During Realignment." This subsection refers to "the following procedures and actions set forth in the Best Practices Guide." To be the best of our knowledge, Appendix F contains much more than is found in the current Best Practices Guide.

We ask the CP to clarify what they are proposing for mitigation of commercial interference to public safety systems during the protracted period between adoption of any order in this proceeding and completion of any regional realignment. The clarification should cover

the possibility of additional interference resulting from adding frequencies as the City and County networks continue to grow during realignment. We see no reason why post-realignment procedures should not apply beforehand, especially since the funding cap still leaves uncertain the entire completion of realignment.⁹

Section 1.2.2. Does this mean each manufacturer of non-voice equipment can set its own minimum recommended interference standard? We look to a day of more choice in public safety equipment and expect manufacturers will build to a single reasonable standard.

Section 1.3. This section omits a third primary mechanism, high-powered transmitters at low commercial sites. There is no mention of commercial power reduction in Appendix F, despite the Commission's call for comment on the tradeoffs among commercial and public safety signal levels, public safety receiver discrimination, number of public safety base stations, and other factors.¹⁰ This is a serious omission, and it cannot be answered simply by promises that commercial providers will reduce power upon complaint, after the fact. We are looking for thresholds and presumptions that will shorten the protracted and exhausting case-by-case remediation that has characterized regulatory practice for too long.

Section 2.1.1. We understand that some current networks are designed to operate at a -103 dBm signal level. The -98 dBm standard would not be reasonable for those operators. Requiring public safety to design and build new networks with a minimum -95dBm signal level means that these networks are going to be more costly to build. It is also setting up a "power war." What is more practical and beneficial to public safety is if the CMRS-type systems were

⁹ Funding is discussed further below.

¹⁰ Notice of Proposed Rulemaking, FCC 02-81, released March 15, 2002, ¶77. ("The corollary to the interference solution [of more robust public safety signals] is that interference -- particularly overload interference -- could be mitigated if the signal of the CMRS station were reduced.")

required to reduce their power levels.¹¹ Otherwise, public safety noise-limited architecture will need to be modified to provide for a “cellular-like” design to meet these requirements.

Section 2.1.2. Since U.S. public safety systems on the Mexican border could operate as high as 860.9875 MHz under existing bilateral agreements, they could be required to provide a desired signal level of -62 dBm before having a valid complaint of interference. That would be both infeasible and discriminatory. Public safety trunked radio systems using the spectrum above 859 MHz would be required to increase signal levels in a coverage area for some of the channels used in the trunk pool. System design for these networks does not typically provide for the ability to use additional transmitter sites for only some of the necessary channels. No equipment exists that we know of that could provide the necessary levels from existing sites, and it would be very difficult to design public safety systems to provide for the necessary additional sites on a portion of the networks channels.

Signal levels required in the spectrum from 859.00 to 861.00 would dictate many more transmitting sites. These sites would need to be placed closer to the intended coverage area and built in the same interference limited design as current “cellular-like architecture.” These additional sites would most likely cause additional interference to adjacent spectrum users.

Section 2.2.1 Protection of data. Why is this being proposed? It contradicts Section 3.1, which states that a complaining agency will post e-mail concerning the interference.

Section 2.2.1a This section is vague and should outline what information is required to perform the analysis.

¹¹ The City and County are part of the Border Area Coalition filing separately today. We associate ourselves with the discussion of power reduction found in those Comments.

Section 2.2.2b This is not feasible for public safety agencies. Who will determine what is current? The majority of maintenance and service bulletins have little or nothing to do with interference or impacts to interference. We do not believe there are any public safety organization today that do this.

What additional cost would be incurred by public safety users to maintain this current equipment status? How can public safety users be protected from having to replace or upgrade equipment when interference occurs by no fault of theirs? Many modifications are presented to equipment users over the life of the equipment that are not performed due to the cost burden on taxpayers and lack of need. This rule would force public safety system operators to perform these modifications before an interference complaint would be acted upon. The CMRS operator should be required to perform system upgrades or modifications to insure that the least amount of transmitter noise possible is being emitted. Where does Appendix F state any CMRS requirement to perform these upgrades?

The primary purpose for a public safety communications network is to provide necessary, lifesaving response to the public in a fiscally responsible manner. Citizens deserve and demand this first and foremost – and it should stand by itself and before the interests of any business or other similar venture.

Section 2.2.2c “The system being interfered with shall be modified to operate in accordance with these signal requirements in the area of purported interference.” Who will pay the cost for these modifications?

Section 2.2.2c After all of the discussion about solving public safety interference, this section states that CMRS operators will assist public safety as long as “assistance does not degrade CMRS service capacity or quality, is of a temporary or interim nature, or is otherwise

acceptable to the CMRS licensee.” This language must be clarified to insure that it in no way absolves CMRS providers from mitigating harmful interference to non-CMRS systems. The Commission should carefully study the proposals contained in Appendix F and develop technical standards for mitigating interference that are applicable for all users of the 800 MHz band – including CMRS system operators.

Section 2.2.4 Equipment Manufacturers. See our comment at Section 1.2.2 about setting standards for non-voice systems.

Section 3.1 See our comment at 2.2.1 concerning confidentiality/non-disclosure agreements.

Section 3.2 This seems excessive. There is a real possibility that all operating cellular/CMRS carriers are located within that one-mile radius. You could also have a situation where other public safety agencies are involved. In most cases, the interference is due to a site in close proximity – within a couple of blocks.

Section 3.3 Why make all carriers do this? Is the time frame of 5 business days practical? Since we can usually pinpoint the cause of interference, why make non-interfering parties participate in this exercise? The requirement should be for the parties identified as most likely to be causing the interference to respond and meet with the affected parties.

Section 4.1.2 Refer to page 43 of the Supplement. There is a mismatch in the figures at the two places in the Supplement. Specifications for 861-895 MHz transmitter out-of-band emissions (“OOBE”) should be adjusted in border areas to better protect non-guard-band spectrum users between 859 and about 860.25.

General Concerns. What are the long term costs to taxpayers supporting public safety systems when those systems are required to use higher-specification radios on networks required

to provide higher signal levels? Multi-channel networks will be required to use higher-specification combiner systems and possibly modify towers for more antennas to fit into the new public safety allocation.

NPSPAC channels in Mexican border areas will need to be moved down to 856-860 and mesh with existing public safety channels. This will require a complete re-coordination of NPSPAC users. The new co-channel users from our neighboring area to the north will not be NPSPAC users and thus will likely not be public safety -- making coordination and efficient channel use more difficult. In addition, NPSPAC channel spacing at 12.5 kHz with reduced bandwidth will be mixed with neighboring 25 kHz full bandwidth channels. Is this technically feasible and prudent for public safety networks? Is there equipment available to accommodate this mixed use – especially in trunked radio systems?

NPSPAC channels are currently allocated as 12.5 kHz channels, and have been given individual channel numbers for each 12.5 slot. The rest of the 800 band does not have these channel numbers every 12.5 kHz. In Motorola trunked radio systems, how will these new channels be programmed into existing equipment? In our area, radios and their systems use the splinter channel designation to allow us to program radios to the offset channels. This is a global system configuration parameter. All channels in a given system use the offset channels. Other systems can be programmed in the same radio to use the standard channels but cannot simultaneously access the offset channels within the same system.

If NPSPAC is moved down the 800 band to a new allocation, how will trunked equipment be programmed to utilize the existing NPSPAC band plan in that new allocation? This would also be a problem in the Motorola Smartnet or Motorola Smartzone system controller, since signaling sent to radios relies on the ability to send a channel number to the

radio, and the radio is programmed to know that it is a splinter (offset channel) or standard frequency configuration.

Adequacy of Funding

The City owns and operates a 20-channel, seven simulcast site Motorola Smartnet Type II trunked analog voice network that began operation in 1992 with a taxpayer expectation of a 15-year useful life. The network is designed for portable coverage and same frequency simulcast over an area of approximately 400 square miles. There are approximately 16,000 users on the network at this time. Based upon our research, we estimate that the following equipment is incapable of being upgraded to allow programming to the re-designated channels under the proposed CP rebanding plan. Below is a cost analysis for the equipment that will need to be replaced to make this rebanding work:

Types and numbers of radios in operation today that do not provide for flashport upgrade¹²

Radio type	Quantity	Replacement Cost per Radio	Total Replacement Cost
GTX	96	\$1300	\$124,800
LCS2000	200	\$1100	\$220,000
LTS2000	262	\$1300	\$340,600
MAXTRAC	377	\$1400	\$527,800
MTX820	444	\$1300	\$577,200
SABER SI	1711	\$3700	\$6,330,700
SPECTRA	1689	\$3200	\$5,404,800
STX	4	\$2000	\$8,000
VISAR	380	\$1300	\$494,000
GRAND TOTAL	5,163	N/A	\$14,027,900

The City has begun the planning process for replacing their current radio infrastructure and their consultant estimates the total cost of network replacement to be between \$60 and \$70 million. No funding has been identified for this replacement.

Despite the addition of \$350 million to the original \$500 million proposed for contribution by Nextel,¹³ we are not convinced that even the new amount is sufficient to accomplish all the tasks that will draw upon it. The County’s suggestion for a “permanent, renewable source of funding” may still be required to backstop the private contribution. Although a given region surely may choose not to begin the process of relocation and/or retuning if funds are not available, this only avoids an unfunded liability. It does not meet the objective of

¹² “Flashport upgrade” means changing the radio’s firmware. If the change cannot be made, the radio must be replaced.

¹³ Made with the so far unrealized hope that other commercial sources of interference would contribute funding as well.

relocation/returning to eliminate or mitigate interference. The City and County hold firm to the principle that taxpayers supporting public safety systems should not bear any costs associated with 800 MHz rebanding that primarily benefits commercial enterprises.

We also have questions about the rate of deposit and security for Nextel's escrow of funds. Rather than repeat them here, we incorporate by reference the funding comments filed today by the Public Safety Improvement Coalition ("PSIC"), to which we belong

CONCLUSION

For the reasons discussed above, we ask that the Commission not adopt the CP solution as supplemented until our numerous concerns and questions -- many shared with the Border Area Coalition and the Public Safety Improvement Coalition -- are carefully considered. Even if Mexican re-negotiation cannot be accomplished prior to the adoption of new rules, its necessity should be acknowledged. Until bilateral agreement revision or some other mechanism evens out 800 MHz channel availability in the heartland and the border regions, we may need temporarily to be grandfathered or otherwise specially exempted from the heartland's realignments

Respectfully submitted,

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City of San Diego 800 MHz Network Agencies

City of San Diego- Public Safety

Police Department
Fire Department
Emergency Medical Services
Lifeguard
Parks Department – Park Rangers
Rural Metro

Additional Public Safety

San Diego Unified School District Police
San Diego Community College District Police
Poway Fire Department

Trauma Network

UCSD Medical Center
Sharp Memorial Hospital
Mercy Hospital
Scripps Chula Vista
Scripps La Jolla
Grossmont Hospital
Palomar Medical Center

City of San Diego – Non-Public Safety

Building Inspection Department
Neighborhood Code Compliance Department
Water Department
Parking Enforcement
Parks and Recreation Department
Qualcomm Stadium
Metropolitan Waste Water Department
San Diego Unified School District
Information Technology & Communications Department
General Services Department

Additional Non-Public Safety

Unified School District Transportation Department
Unified School District Food Services
Unified School District Administrative Services
Unified School District Maintenance Services
Unified School District Landscaping Services

Mutual Aid Public Safety

San Diego County Sheriffs Department

Chula Vista Police

Chula Vista Fire/ EMS

Coronado Police

Coronado Fire/ EMS

La Mesa Police

La Mesa Fire/ EMS

Escondido Police

Escondido Fire/ EMS

National City Police

South Bay Fire District

East County Fire District

Ramona Fire

Rancho Santa Fe Fire

Imperial Beach Fire/ EMS

Lemon Grove Fire/ EMS

Santee Fire/ EMS

El Cajon Fire/ EMS

Del Mar Fire

Encinitas Fire

Mercy Air

San Diego Unified Port District Police

University of California- San Diego

San Diego State University

Secret Service

FBI

Border Patrol

Regional Communications System Agencies



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Regional Communications System Agencies

City of Carlsbad

- 1 Fire/EMS
- 2 Police
- 3 Lifeguard
- 4 Public Works

City of Chula Vista

- 5 Police
- 6 Fire/EMS
- 7 Public Works

City of Coronado

- 8 Fire/EMS
- 9 Police
- 10 Lifeguard
- 11 Public Services
- 12 Recreation

City of Del Mar

- 13 Fire/EMS
- 14 Law (Sheriff)
- 15 Lifeguard
- 16 Public Works

City of El Cajon

- 17 Fire/EMS
- 18 Police
- 19 Public Works

City of Encinitas

- 20 Fire/EMS
- 21 Law (Sheriff)
- 22 Lifeguard
- 23 Public Works

City of Escondido

- 24 Police
- 25 Fire/EMS
- 26 Public Works

City of Imperial Beach

- 27 Fire/EMS
- 28 Law (Sheriff)
- 29 Lifeguard
- 30 Public Works

City of La Mesa

- 31 Police
- 32 Fire/EMS
- 33 Public Works

City of Lemon Grove

- 34 Fire/EMS
- 35 Law (Sheriff)
- 36 Public Works

City of Poway

- 37 Fire/EMS
- 38 Law (Sheriff)
- 39 Public Works

City of Oceanside

- 40 Fire
- 41 Law
- 42 Public Works
- 43 Parks & Recreation
- 44 Harbor Patrol

City of San Marcos

- 45 Fire/EMS
- 46 Law (Sheriff)
- 47 Public Works

City of Santee

- 48 Fire/EMS
- 49 Law (Sheriff)
- 50 Public Works

City of Solana Beach

- 51 Fire/EMS
- 52 Law (Sheriff)
- 53 Lifeguards
- 54 Public Works

City of Vista

- 55 Law (Sheriff)
- 56 Fire/EMS
- 57 Public Works

San Diego County Depts.

- 58 Agriculture
- 59 Animal Control
- 60 Office of Emergency Services
- 61 District Attorney
- 62 EMS (CSA 17)
- 63 General Services
- 64 Health Services
- 65 Medical Examiner
- 66 Parks & Recreation
- 67 Planning & Land Use
- 68 Probation
- 69 Public Administrator
- 70 Public Works
- 71 Sheriff's Department

Fire Districts

- 72 Alpine Fire
- 73 Bonita-Sunnyside Fire
- 74 Borrego Springs Fire
- 75 Boulevard Fire
- 76 Campo Fire
- 77 Deer Springs Fire
- 78 DeLuz Fire
- 79 East County Fire
- 80 Elfin Forest Fire
- 81 Intermountain Fire
- 82 Julian-Cuyamaca Fire

Fire Districts (cont'd.)

- 83 Lakeside Fire
- 84 Mt. Laguna Fire
- 85 North County Fire
- 86 Ocotillo Wells Fire
- 87 Palomar Mountain Fire
- 88 Pine Valley Fire
- 89 Ramona Fire
- 90 Ranchita Fire
- 91 Rancho Santa Fe Fire
- 92 Rural Fire
- 93 San Miguel Fire
- 94 San Pasqual Fire
- 95 Shelter Valley Fire
- 96 Sunshine Summit Fire
- 97 Warner Springs Fire
- 98 Valley Center Fire
- 99 Vista Fire

EMS Trauma Network

- 100 Alvarado Hospital
- 101 American Medical Response
- 102 Balboa Ambulance
- 103 Balboa Naval Hospital
- 104 Barona Ambulance
- 105 San Diego Blood Bank
- 106 Care Ambulance
- 107 Children's Hospital
- 108 Coronado Hospital
- 109 Event Medical
- 110 Fallbrook Hospital
- 111 Grossmont Hospital
- 112 Kaiser Hospital
- 113 Mercy Air
- 114 Naval Medical-Pendleton
- 115 Palomar Medical Center
- 116 Paradise Valley Hospital
- 117 Pomerado Hospital
- 118 Priority One
- 119 Schaefer Ambulance
- 120 Scripps Chula Vista
- 121 Scripps Encinitas
- 122 Scripps La Jolla
- 123 Scripps Mercy
- 124 Sharp Chula Vista
- 125 Sharp Memorial
- 126 Sycuan Ambulance
- 127 Star Ambulance
- 128 Thornton Hospital
- 129 Tri City Medical Center
- 130 UCSD Medical Center

Regional Communications System Agencies

Others

131 VA Hospital
 132 Americare Services
 133 Borrego Sun Newspaper
 134 California Highway Patrol
 135 Cajon Valley School District
 136 CALTRANS, District 11
 137 Cal State San Marcos PD
 138 City News Service
 139 Freeway Service Patrol
 140 Grossmont College Police
 141 Grossmont School District
 142 Heritage Security
 143 Imperial County EMS
 144 KFMB
 145 KGTV
 146 KNSD
 147 KOGO/Clear Channel
 148 KSWB
 149 MTDB
 150 North County Times
 151 North County Transit Sec.
 152 Palomar College
 153 Padre Dam Water District
 154 Poway Unified School Dist
 155 Rancho Santa Fe Patrol
 156 SDG&E Watershed Team
 157 San Diego Humane Society
 158 San Diego State University
 159 Santee School District
 160 State Corrections (Parole)
 161 Union Tribune
 162 USD Police
 163 Vista Unified School District
 164 XETV

Pending Imperial County

County of Imperial

165 Imperial County Sheriff's Dept.
 166 Probation Department
 167 Imperial County Fire Dept.

City of El Centro

168 El Centro Police Department
 169 El Centro Fire Department
 170 El Centro Public Works

City of Holtville

171 Holtville Police Department
 172 Holtville Fire Department

City of Brawley

173 Brawley Police Department
 174 Brawley Fire Department

City of Calexico

175 Calexico Police Department
 176 Calexico Fire Department

City of Calipatria

177 Calipatria Police Department

City of Westmoreland

178 Westmoreland Police Dept.

City of Imperial

179 Imperial Police Department
 180 Imperial Fire Department

Mutual Aid Agencies

181 Air National Guard
 182 Barona Reservation Fire
 183 CDF
 184 Camp Pendleton Fire
 185 Campo Reservation Fire
 186 FAA Gillespie Field
 187 FBI
 188 Harbor Police
 189 Helix Water District

Mutual Aid Agencies (con't.)

190 INS
 191 MCAS Miramar Fire
 192 Legoland
 193 Olivenhain Water District
 194 Marine Corp Recruit Depot
 195 Metro.Med.Strike Team EMS
 196 National City Fire
 197 National City Law
 198 North Island Air EMS
 199 San Diego Fire
 200 SD Intl. Airport Operations
 201 San Diego Police
 202 State Park Colo. Desert Dist.
 203 Sycuan Reservation Fire
 204 U.S. Bureau of Land Mgmt
 205 U.S. Customs
 206 U.S. Fish & Wildlife
 207 U.S. Forest Service

Dispatch Centers

1 CALTRANS TMC
 2 Carlsbad Dispatch
 3 Chula Vista Police-Fire
 4 Coronado Police-Fire
 5 Sheriff's Dispatch
 6 El Cajon Police Dispatch
 7 Escondido Police-Fire
 8 Heartland Comm. Fire JPA
 9 La Mesa Police
 10 Monte Vista CDF Dispatch
 11 Oceanside Police-Fire
 12 Rancho Santa Fe JPA

Pending Dispatch Ctrs.

13 Imperial County Sheriff Disp.
 14 El Centro Dispatch

ATTACHMENT 3



san diego joint filing
- attac...

	A	B	C	D	E	F	G	H	I
1	FCC	Offset	Regular	Licensee	Adj Licensee	Nearest		New User	New User
2		856							
3	201A	0		Unavailable					
4	201		0.0125		MRA, Peterson				
5	202A	0.025		San Diego City					
6	202		0.0375		NEXTEL				
7	203A	0.05		San Diego City					
8	203		0.0625		NEXTEL				
9	204A	0.075		San Diego City					
10	204		0.0875		MRA				
11	205A	0.1		Calif State					
12	205		0.1125		NEXTEL	Fallbrook*			
13	206A	0.125		Calif State					
14	206		0.1375		NEXTEL	Santiago			
15	207A	0.15		SDGE					Available
16	207		0.1625		NEXTEL	Santiago			
17	208A	0.175		RCS					
18	208		0.1875		NEXTEL	OK			
19	209A	0.2		RCS					
20	209		0.2125		Or Co				
21	210A	0.225		RCS					
22	210		0.2375		LA				
23	211A	0.25		RCS					
24	211		0.2625		Huntington Bch	Newport B			
25	212A	0.275		NEXTEL					Available
26	212		0.2875		NEXTEL	Hemet			
27	213A	0.3		SDGE					Available
28	213		0.3125		NEXTEL	Santiago			
29	214A	0.325		SD Transit					
30	214		0.3375		MSL Freight	Indio			
31	215A	0.35		RD Hazard					Available
32	215		0.3625		IID	Indio			
33	216A	0.375		Peak Relay Inc					
34	216		0.3875		Or Co Ind'l Comm	Santiago			
35	217A	0.4		NEXTEL					
36	217		0.4125		Supershuttle	Santiago			
37	218A	0.425		RCS, UofCal SB					
38	218		0.4375		LA	LA			
39	219A	0.45		NEXTEL					
40	219		0.4625		Or Co	Santiago			
41	220A	0.475		Com'l					
42	220		0.4875		Or Co Transp	Santiago			
43	221A	0.5		NEXTEL					
44	221		0.5125		NEXTEL	Costa Mesa			
45	222A	0.525		NEXTEL				San Diego City	
46	222		0.5375		NEXTEL	Or Co low			
47	223A	0.55		Fedex				San Diego City	
48	223		0.5625		NEXTEL				
49	224A	0.575		Com'l				San Diego City	
50	224		0.5875		NEXTEL	Santiago			
51	225A	0.6		Cox, Baskins					Available
52	225		0.6125		NEXTEL, MRA	Elsinore			
53	226A	0.625		Fedex					
54	226		0.6375		Evans	Santiago			
55	227A	0.65		Motent Comm					

	A	B	C	D	E	F	G	H	I
1	FCC	Offset	Regular	Licensee	Adj Licensee	Nearest		New User	New User
56	227		0.6625		NEXTEL				
57	228A	0.675		NEXTEL					Available
58	228		0.6875		NEXTEL				
59	229A	0.7		NEXTEL					
60	229		0.7125		Or Co	Santiago			
61	230A	0.725		NEXTEL					
62	230		0.7375		Calif	Santiago			
63	231A	0.75		NEXTEL					
64	231		0.7625		LA, Imp Co	LA, Cactus			
65	232A	0.775		NEXTEL					Available
66	232		0.7875		Com'l				
67	233A	0.8		NEXTEL					Available
68	233		0.8125		San Ber				
69	234A	0.825		NEXTEL					Available
70	234		0.8375		FedEx				
71	235A	0.85		NEXTEL					Available
72	235		0.8625		Crawford				
73	236A	0.875		Nextel					Available
74	236		0.8875		NEXTEL				
75	237A	0.9		NEXTEL					Available
76	237		0.9125		Jarupa Usd	Box Spring			
77	238A	0.925		NEXTEL					Available
78	238		0.9375		LA	LA			
79	239A	0.95		NEXTEL					
80	239		0.9625		Or Co	Santiago			
81	240A	0.975		Palomar Comm					
82	240		0.9875		Calif	Or Co low			
83		857							
84	241A	0		San Diego City					
85	241		0.0125		NEXTEL				
86	242A	0.025		San Diego City					
87	242		0.0375		NEXTEL				
88	243A	0.05		San Diego City					
89	243		0.0625		NEXTEL				
90	244A	0.075		San Diego City					
91	244		0.0875		MRA				
92	245A	0.1		RCS					
93	245		0.1125		NEXTEL	Fallbrook*			
94	246A	0.125		Calif State					
95	246		0.1375		NEXTEL	Santiago			
96	247A	0.15		SDGE					Available
97	247		0.1625		NEXTEL	Santiago			
98	248A	0.175		RCS					
99	248		0.1875		NEXTEL				
100	249A	0.2		RCS					
101	249		0.2125		Or Co				
102	250A	0.225		RCS					
103	250		0.2375		LA				
104	251A	0.25		RCS					
105	251		0.2625		Costa Mesa	Costa Mesa			
106	252A	0.275		NEXTEL					Available
107	252		0.2875		NEXTEL	Hemet			
108	253A	0.3		SDGE					Available
109	253		0.3125		NEXTEL	Santiago			

	A	B	C	D	E	F	G	H	I
1	FCC	Offset	Regular	Licensee	Adj Licensee	Nearest		New User	New User
110	254A	0.325		SDTransit					
111	254		0.3375		CNF Trans	Modjeska			
112	255A	0.35		NEXTEL					
113	255		0.3625		San Ber	OK			
114	256A	0.375		NEXTEL					Available
115	256		0.3875		NEXTEL	Santiago			
116	257A	0.4		Fedex					Available
117	257		0.4125		NEXTEL				
118	258A	0.425		Sweetwater HS					
119	258		0.4375		LA	LA			
120	259A	0.45		NEXTEL					
121	259		0.4625		Or Co	Santiago			
122	260A	0.475		NEXTEL					
123	260		0.4875		Or Co	Santiago			
124	261A	0.5		Com'l					
125	261		0.5125		NEXTEL	Thermal			
126	262A	0.525		Auto Club				San Diego City	
127	262		0.5375		Barney Peterson	Indio			
128	263A	0.55		Com'l				San Diego City	
129	263		0.5625		NEXTEL				
130	264A	0.575		Sup Rdy Mix, Lone Star				San Diego City	
131	264		0.5875		NEXTEL	Santiago			
132	265A	0.6		NEXTEL					Available
133	265		0.6125		MRA	Elsinore Pk			
134	266A	0.625		Rescu Root, Palomar Comm					
135	266		0.6375		Jim Evans	Santiago			
136	267A	0.65		NEXTEL					
137	267		0.6625		RAE	Indio			
138	268A	0.675		NEXTEL					Available
139	268		0.6875		NEXTEL				
140	269A	0.7		NEXTEL					
141	269		0.7125		Or Co	Santiago			
142	270A	0.725		NEXTEL					
143	270		0.7375		Calif	Santiago			
144	271A	0.75		NEXTEL					
145	271		0.7625		LA	LA			
146	272A	0.775		NEXTEL					
147	272		0.7875		MSL Freight	Santiago			
148	273A	0.8		NEXTEL					
149	273		0.8125		San Ber				
150	274A	0.825		NEXTEL					
151	274		0.8375		FedEx	Santiago			
152	275A	0.85		NEXTEL					
153	275		0.8625		FedEx				
154	276A	0.875		NEXTEL					Available
155	276		0.8875		Aeronautical				
156	277A	0.9		NEXTEL					Available
157	277		0.9125		NEXTEL				
158	278A	0.925		NEXTEL					Available
159	278		0.9375		LA				
160	279A	0.95		NEXTEL					
161	279		0.9625		Or Co	Santiago			
162	280A	0.975		Palomar Comm					
163	280		0.9875		Calif				

	A	B	C	D	E	F	G	H	I
1	FCC	Offset	Regular	Licensee	Adj Licensee	Nearest		New User	New User
164		858							
165	281A	0		San Diego City					
166	281		0.0125		NEXTEL				
167	282A	0.025		San Diego City					
168	282		0.0375		NEXTEL				
169	283A	0.05		San Diego City					
170	283		0.0625		NEXTEL				
171	284A	0.075		San Diego City					
172	284		0.0875		MRA				
173	285A	0.1		Calif State					
174	285		0.1125		NEXTEL	Fallbrook*			
175	286A	0.125		Calif State					
176	286		0.1375		NEXTEL	Santiago			
177	287A	0.15		SDGE					Available
178	287		0.1625		NEXTEL	Santiago			
179	288A	0.175		RCS					
180	288		0.1875		NEXTEL	Calif			
181	289A	0.2		RCS					
182	289		0.2125		Or Co				
183	290A	0.225		RCS					
184	290		0.2375		LA				
185	291A	0.25		RCS					
186	291		0.2625		Calif	Perris			
187	292A	0.275		Peak Relay Inc					Available
188	292		0.2875		Signal Hill				
189	293A	0.3		NEXTEL					Available
190	293		0.3125		NEXTEL	Santiago			
191	294A	0.325		SDTransit					
192	294		0.3375		Garden Grove et. A	Santiago			
193	295A	0.35		NEXTEL					
194	295		0.3625		Taxi Systems	Santiago			
195	296A	0.375		NEXTEL					
196	296		0.3875		San Ber	San Ber			
197	297A	0.4		Lone Star, Action					
198	297		0.4125		Or Co Transp	Santiago			
199	298A	0.425		NEXTEL					
200	298		0.4375		LA	LA			
201	299A	0.45		NEXTEL					
202	299		0.4625		Or Co	Santiago			
203	300A	0.475		Motent Comm					
204	300		0.4875		Or Co	Santiago			
205	301A	0.5		NEXTEL					
206	301		0.5125		NEXTEL				
207	302A	0.525		NEXTEL				San Diego City	
208	302		0.5375		Peterson	Indio			
209	303A	0.55		Laidlaw Trans				San Diego City	
210	303		0.5625		NEXTEL				
211	304A	0.575		Motent Comm				San Diego City	
212	304		0.5875		NEXTEL				
213	305A	0.6		NEXTEL					Available
214	305		0.6125		MRA	Elsinore			
215	306A	0.625		NEXTEL					
216	306		0.6375		Jim Evans	Santiago			
217	307A	0.65		Lone Star, Chris Hovey					

	A	B	C	D	E	F	G	H	I
1	FCC	Offset	Regular	Licensee	Adj Licensee	Nearest		New User	New User
218	307		0.6625		RAE	Indio			
219	308A	0.675		NEXTEL					Available
220	308		0.6875		NEXTEL				
221	309A	0.7		NEXTEL					
222	309		0.7125		Or Co	Santiago			
223	310A	0.725		NEXTEL					
224	310		0.7375		Calif	Santiago			
225	311A	0.75		NEXTEL					
226	311		0.7625		LA				
227	312A	0.775		NEXTEL					Available
228	312		0.7875		Fisher	Indio			
229	313A	0.8		NEXTEL					Available
230	313		0.8125		FedEx	Rancho Palos Verdes			
231	314A	0.825		NEXTEL					Available
232	314		0.8375		San Ber				
233	315A	0.85		NEXTEL					
234	315		0.8625		FedEx	Santiago			
235	316A	0.875		NEXTEL					
236	316		0.8875		Aeronautical	John Wayne			
237	317A	0.9		NEXTEL					Available
238	317		0.9125		James Kay				
239	318A	0.925		NEXTEL					Available
240	318		0.9375		LA	LA			
241	319A	0.95		NEXTEL					
242	319		0.9625		Or Co	Santiago			
243	320A	0.975		Palomar Comm					
244	320		0.9875		Calif	Santiago			
245		859							
246	321A	0		San Diego City					
247	321		0.0125		NEXTEL				
248	322A	0.025		San Diego City					
249	322		0.0375		NEXTEL				
250	323A	0.05		San Diego City					
251	323		0.0625		NEXTEL				
252	324A	0.075		RCS					
253	324		0.0875		NEXTEL				
254	325A	0.1		RCS					
255	325		0.1125		NEXTEL	Fallbrook*			
256	326A	0.125		Calif State					
257	326		0.1375		NEXTEL	Santiago			
258	327A	0.15		SDGE					Available
259	327		0.1625		NEXTEL	Santiago			
260	328A	0.175		SDGE					Available
261	328		0.1875		NEXTEL	Elsinore Pk			
262	329A	0.2		RCS					
263	329		0.2125		Or Co				
264	330A	0.225		San Diego City					
265	330		0.2375		Glendale				
266	331A	0.25		RCS					
267	331		0.2625		Montebello				
268	332A	0.275		N San Diego County					
269	332		0.2875		FedEx	Santiago			
270	333A	0.3		NEXTEL					
271	333		0.3125		International Un	Santiago			

	A	B	C	D	E	F	G	H	I
1	FCC	Offset	Regular	Licensee	Adj Licensee	Nearest		New User	New User
272	334A	0.325		SDTransit					
273	334		0.3375		NEXTEL	Edom Hill			
274	335A	0.35		NEXTEL					
275	335		0.3625		Fisher	Indio			
276	336A	0.375		Consolidated Portables					Available
277	336		0.3875		San Ber				
278	337A	0.4		NEXTEL					
279	337		0.4125		Ready Mix	Santiago			
280	338A	0.425		NEXTEL					
281	338		0.4375		LA	LA			
282	339A	0.45		Pac Bell					
283	339		0.4625		Or Co	Santiago			
284	340A	0.475		NEXTEL					
285	340		0.4875		Or Co	Santiago			
286	341A	0.5		Com'l					
287	341		0.5125		NEXTEL				
288	342A	0.525		NEXTEL				San Diego City	
289	342		0.5375		NEXTEL, Peterson	Indio			
290	343A	0.55		NEXTEL				San Diego City	
291	343		0.5625		NEXTEL	Santiago			
292	344A	0.575		Superior Rdy Mix				San Diego City	
293	344		0.5875		NEXTEL				
294	345A	0.6		NEXTEL					
295	345		0.6125		MRA	Elsinore			
296	346A	0.625		Com'l					Available
297	346		0.6375		NEXTEL	Santiago			
298	347A	0.65		NEXTEL					Available
299	347		0.6625		RAE	Indio			
300	348A	0.675		NEXTEL					Available
301	348		0.6875		NEXTEL				
302	349A	0.7		NEXTEL					
303	349		0.7125		Or Co	Santiago			
304	350A	0.725		NEXTEL					
305	350		0.7375		Calif	San Ber			
306	351A	0.75		NEXTEL					Available
307	351		0.7625		LA	LA			
308	352A	0.775		NEXTEL					
309	352		0.7875		Buddy	Santiago			
310	353A	0.8		NEXTEL					
311	353		0.8125		San Ber				
312	354A	0.825		NEXTEL					Available
313	354		0.8375		San Ber				
314	355A	0.85		NEXTEL					Available
315	355		0.8625		FedEx				
316	356A	0.875		NEXTEL					Available
317	356		0.8875		So Cal Gas	Elsinore			
318	357A	0.9		NEXTEL					Available
319	357		0.9125		Fisher	Indio			
320	358A	0.925		NEXTEL					Available
321	358		0.9375		LA	LA			
322	359A	0.95		NEXTEL					
323	359		0.9625		Or Co	Santiago			
324	360A	0.975		Palomar Comm					
325	360		0.9875		Calif	Santiago			

	A	B	C	D	E	F	G	H	I
1	FCC	Offset	Regular	Licensee	Adj Licensee	Nearest		New User	New User
326		860							
327	361A	0		San Diego City					
328	361		0.0125		NEXTEL				
329	362A	0.025		San Diego City					
330	362		0.0375		NEXTEL				
331	363A	0.05		San Diego City					
332	363		0.0625		NEXTEL				
333	364A	0.075		San Diego City					
334	364		0.0875		NEXTEL				
335	365A	0.1		RCS					
336	365		0.1125		NEXTEL	Fallbrook*			
337	366A	0.125		Calif State					
338	366		0.1375		NEXTEL	Santiago			
339	367A	0.15		SDGE					Available
340	367		0.1625		NEXTEL	Santiago			
341	368A	0.175		SDGE					Available
342	368		0.1875		NEXTEL	Edom Hill			
343	369A	0.2		RCS					
344	369		0.2125		Or Co				
345	370A	0.225		RCS					
346	370		0.2375		Long Beach, Calif				
347	371A	0.25		RCS					
348									
349	371		0.2625		LA	LA			
350	372A	0.275		NEXTEL					
351	372		0.2875		San Ber	Hemet			
352	373A	0.3		NEXTEL					
353	373		0.3125		Sunset Bus	Hemet			
354	374A	0.325		SDTransit					
355	374		0.3375		IID				
356	375A	0.35		No SDTransit					
357	375		0.3625		Taxi Systems	Santiago			
358	376A	0.375		NEXTEL					
359	376		0.3875		Garden Grove, IID	Santiago			
360	377A	0.4		NEXTEL					
361	377		0.4125		Telephone Comm	Hemet			
362	378A	0.425		SDGE					
363	378		0.4375		LA	LA			
364	379A	0.45		Penhall Rent					
365	379		0.4625		Or Co	Santiago			
366	380A	0.475		Com'l					
367	380		0.4875		Or Co Transp	Santiago			
368	381A	0.5		Time Warner					
369	381		0.5125		NEXTEL	low level			
370	382A	0.525		Com'l					
371	382		0.5375		NEXTEL	low level			
372	383A	0.55		Palomar Comm					
373	383		0.5625		NEXTEL	low level			
374	384A	0.575		Superior Rdy Mix					
375	384		0.5875		NEXTEL	Santiago			
376	385A	0.6		Com'l					
377	385		0.6125		NEXTEL				
378	386A	0.625		NEXTEL					
379	386		0.6375		MRA				

	A	B	C	D	E	F	G	H	I
1	FCC	Offset	Regular	Licensee	Adj Licensee	Nearest		New User	New User
380	387A	0.65		NEXTEL					
381	387		0.6625		NEXTEL	Steinberger			
382	388A	0.675		NEXTEL					
383	388		0.6875		NEXTEL				
384	389A	0.7		NEXTEL					
385	389		0.7125		Or Co	Santiago			
386	390A	0.725		NEXTEL					
387	390		0.7375		Calif	Santiago			
388	391A	0.75		NEXTEL					
389	391		0.7625		LA, Imp Co	LA, Cactus			
390	392A	0.775		NEXTEL					
391	392		0.7875		Edison				
392	393A	0.8		NEXTEL					
393	393		0.8125		San Ber				
394	394A	0.825		NEXTEL					
395	394		0.8375		San Ber				
396	395A	0.85		NEXTEL					
397	395		0.8625		FedEx				
398	396A	0.875		NEXTEL					
399	396		0.8875		Aeronautical				
400	397A	0.9		NEXTEL					
401	397		0.9125		NEXTEL	low level			
402	398A	0.925		NEXTEL					
403	398		0.9375		LA	LA			
404	399A	0.95		NEXTEL					
405	399		0.9625		Or Co	Santiago			
406	400A	0.975		Palomar Comm					
407	400		0.9875		Calif	Johnstone			
408	401A	861		RCS					
409									
410									
411		Industrial/Land Mobile			Fallbrook shows as Riverside County on licensing				
412		Business							
413		SMR					KN 1/22/03		

San Diego /Mexican Border Area Realignment

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.