

PCIA's Reply Comments in the WP Docket No. 07-100 Proceeding

On May 28, 2010, PCIA filed reply comments in the Second Report and Order and Second Further Notice of Proposed Rulemaking - WP Docket No. 07-100 proceeding. Thus far, the feedback concerning the filing has been positive.

We have concerns about the proposed protection criteria for radio systems eligible for protection in the bands below 470 MHz. We believe the protection criteria suggested in this Notice of Proposed Rulemaking is overly conservative. While this approach was appropriate when this issue was initially addressed, it was agreed that the matter should be revisited as we gained more insight.

Given the extensive implementation of narrowband systems, we believe it is appropriate to take a more aggressive approach toward implementing additional narrowband systems and achieving the goal of providing greater spectral density in the 150 to 470 MHz bands. Based on our review of this subject, and our consultation with land mobile engineers, we offered the following recommendations for providing interference protection as we move toward increasing spectrum efficiency for the future of land mobile communication.

Utilize adjusted F(50,50) criteria for interference parameters for systems below 470 MHz. It makes sense to take the opportunity now to maximize spectrum availability while increasing interference prediction accuracy. Increasing the accuracy of coverage and interference predictions reduces the need for conservatism in protection parameters.

We recognize that performance requirements for public safety radio systems are usually more rigorous and critical than the requirements for industrial/business radio systems. As the industry migrates to systems with more variety in bandwidth and transmission techniques on the same or immediately adjacent frequencies, we believe these critical public safety performance requirements must be recognized and, where appropriate, afforded higher levels of protection.

As the narrowband deadline approaches, encouraging the rapid implementation of narrowband systems must be balanced against the need to ensure that public safety radio systems are provided adequate protection during the transition. PCIA recommends that eligible wideband public safety systems receive uninterrupted, rigorous interference protection during the transition to narrowband.

PCIA's consultations with land mobile engineers resulted in a series of interference charts that take into account a variety of potential bandwidth, technology, protection criteria and channel center possibilities. We reviewed the recommendations and feel that they are valid and feasible. PCIA believes that its proposal represents a legitimate compromise between the need to ensure maximum opportunities for new narrowband systems, while adequately protecting incumbent radio systems. This approach makes it possible to place systems into very concentrated markets with a high degree of success.

You can view the comments in this proceeding by typing 07-100 at the following link http://fjallfoss.fcc.gov/ecfs/proceeding_search/input?z=vx14z