

Before the  
**Federal Communications Commission**  
Washington, DC 20554

In the Matter of the Petition of )  
 )  
National Public Safety Telecommunications )  
Council )  
 ) RM-11433  
Petition for Rulemaking to Allow Aircraft )  
Voice Operations on Secondary Trunking )  
Channels in the 700 MHz Band )

To: The Commission

**REPLY COMMENTS OF THE TELECOMMUNICATIONS INDUSTRY**  
**ASSOCIATION**

The Telecommunications Industry Association (TIA) files these reply comments in response to the Public Notice issued by the Federal Communications Commission’s (Commission) Public Safety and Homeland Security Bureau (PSHSB) on June 30, 2011 in the above-captioned proceeding.<sup>1</sup> The Petition, submitted by the National Public Safety Telecommunications Council (NPSTC), asks the FCC to undergo a rulemaking to allow for aircraft voice operations on secondary trunking channels in the 700 MHz band, those being 769-775 MHz, 799-805 MHz.<sup>2</sup> TIA is submitting these reply comments to request that, if the Commission initiates a rulemaking proceeding, the Commission should: (i) conduct an analysis on the interference impact of the proposed aircraft operations on other 700 MHz narrowband operations as well as

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<sup>1</sup> Public Notice, *Public Safety and Homeland Security Bureau Seeks Comment on National Public Safety Telecommunications Council’s Petition for Rulemaking to Allow Aircraft Voice Operations on Secondary Trunking Channels in the 700 MHz Band*, RM-11433, DA 11-1146 (Jun. 30, 2011) (Public Notice).

<sup>2</sup> Petition for Rulemaking filed by the NPSTC, WT Docket No. 96-86 (March 18, 2010) (NPSTC Petition).

on broadband operations in adjacent blocks in the band; and (ii) adopt appropriate safeguards to protect those operations from harmful interference.

TIA represents the global information and communications technology (ICT) industry through standards development, advocacy, tradeshow, business opportunities, market intelligence and world-wide environmental regulatory analysis. Its 600 member companies manufacture or supply the products and services used in the provision of broadband and broadband-enabled applications. For over eighty years, TIA has enhanced the business environment for broadband, mobile wireless, information technology, networks, cable, satellite, and unified communications. Members' products and services compete to empower communications in every industry and market, including healthcare, education, security, public safety, transportation, government, the military, the environment and entertainment. TIA is accredited by the American National Standards Institute (ANSI). TIA members are involved in Project 25, the initiative that continues to develop standards for narrowband interoperability.<sup>3</sup> Numerous TIA representatives are manufacturers of equipment used in both 700 MHz public safety narrowband as well as broadband networks, and therefore have a significant interest in ensuring the most efficient and interoperable public safety communications landscape.

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<sup>3</sup> TIA's TR-8 has created a series of technical documents known as the TIA-102 suite of standard. This consensus-based standard describes and/or defines a number of the interfaces associated with The Project 25 Standard digital land mobile radio system. Law enforcement and other public safety entities may or may not utilize wireless communications systems and equipment which include the TIA-102 standard, in whole or in part. Additionally, in cases where public safety utilizes TIA-102-based equipment, such equipment may also include features and functions that are not defined by the standard, but which features and functions a public safety agency requires for addressing that agency's operational needs. *See* <http://www.tiaonline.org/standards/committees/committee.cfm?comm=tr-8>. An overview of the most recent TR-8 activity is provided in TIA's annually released report on its standards activity. *See* TIA, *2010-2011 Standards & Technology Annual Report* (rel. Apr. 2011) at 8-11, available at [http://tiaonline.org/standards/about/documents/StarReport\\_10-11.pdf](http://tiaonline.org/standards/about/documents/StarReport_10-11.pdf).

TIA wishes to emphasize its strong backing of the Commission's efforts to promote more efficient use of spectrum in public safety narrowband channels, and specifically fully supports the use of narrowband channels by States in an increasingly efficient manner. As noted in the record, aircraft operations are regarded by some public safety entities as an unresolved problem.<sup>4</sup> Additionally, the further examination of the proposals in the NPSTC Petition in a rulemaking appears to have preliminary support.<sup>5</sup> TIA agrees that increased efficiency in 769-775 MHz and 799-805 MHz channels will undoubtedly promote the heightened protection of life, health, and property for jurisdictions that utilize an air service.

However, integral to the increased efficiency in spectrum use is the protection from harmful interference. As TIA has previously advocated, the Commission should take maximal care with regards to interference protection for public safety communications.<sup>6</sup> The potential risk to public safety bands of interference gives rise to degraded service for mission-critical narrowband uses, and can have catastrophic consequences. TIA believes that frequency use by any entity, governmental or non-governmental, providing for the protection of life, health, or property must be protected from interference.

Based on this essential concern, should a rulemaking be undertaken as requested by the NPSTC Petition, TIA urges that the Commission take comprehensive steps to review the potential impact

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<sup>4</sup> See, e.g., Comments of the Ohio Statewide Interoperability Executive Committee (OSIEC Comments), RM-11433 (filed Jul. 15, 2011) at 1.

<sup>5</sup> See Comments of Motorola Solutions, Inc., RM-11433 (filed Jul. 15, 2011); Comments of the Region 39 700 MHz Regional Planning Committee, RM-11433 (filed Jul. 15, 2011); Comments of the National Regional Planning Council, RM-11433 (filed Jul. 15, 2011); OSIEC Comments.

<sup>6</sup> See, e.g., Comments of TIA, WT Docket No. 11-69, ET Docket No. 09-234 (filed Jun. 27, 2011) at 3.

of the proposed narrowband operations on 700 MHz public safety and commercial broadband network services in adjacent broadband blocks, and adopt appropriate measures to safeguard such broadband operations from potential interference. In addition, the Commission should ensure that allowing for the uses proposed in the NPSTC Petition does not derail near-term narrowband deployments. One recommendation would be for the Commission to require applicants to submit an affirmative representation that potential interference causes have been considered, such as the effect on push-to-talk uses by helicopters.

For the foregoing reasons, TIA requests the Commission to take the above concerns into consideration should it elect to proceed with a rulemaking as proposed in the NPSTC petition.

Respectfully submitted,

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