



NATIONAL PUBLIC SAFETY TELECOMMUNICATIONS COUNCIL

March 8, 2011

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Re: The Broadband for First Responders' Act of 2011, H.R. 607

Greetings:

NPSTC is in receipt of your letter dated February 24, 2011 stating ARRL's position on H.R. 607, the *Broadband for First Responders' Act of 2011*. The NPSTC Governing Board, of which ARRL is a member, had an opportunity to discuss this legislation at its Governing Board meeting held February 28 through March 1. We want to let you know that NPSTC's Governing Board understands your serious concerns about Section 207 of this Act, and we share those concerns.

As you know, the allocation of the "D-Block" spectrum to public safety is critical to deploying a nationwide interoperable broadband network. Public safety is united in its support for H.R. 607 because the Act would allocate the D-Block spectrum to public safety to build a 20 MHz nationwide broadband network. The Act also would provide sufficient funding for the construction and maintenance of a nationwide Public Safety broadband network.

The Act, however, requires public safety to "give back" spectrum above 400 MHz and below 512 MHz to "off set" the cost of allocating the D-Block. The Act also requires the Federal Communications Commission to auction spectrum in the 420-440 MHz and 450-470 MHz after public safety has migrated their systems above the 700 MHz spectrum band. NPSTC is very concerned about the impact the migration requirement will have on public safety entities that are currently licensed to operate Land Mobile Radio (LMR) systems in the spectrum band.

We are aware that the Amateur Radio Service shares the 420-440 MHz band on a secondary basis with the Government Radiolocation Service and Amateur Radio operators can

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use that band for critical emergency and public service communications. We are also aware that the extensive Amateur Radio repeater systems, which are very important in supporting public safety operations, require control and interconnect links located in the 420-440 MHz band. Finally, we are aware of the narrowband experimentation and satellite and terrestrial infrastructure in this band which cannot be moved.

For the above reasons, NPSTC is very concerned about Section 207(d) of the Act and believes that the section needs to be amended to address the concerns of public safety and the amateur radio users.

While NPSTC believes ARRL's opposition to Section 207(d) is appropriate, this is unrelated to our support for the provisions in the remainder of the Act. We are pleased to have ARRL's active participation in NPSTC. Please let your members know of NPSTC's appreciation of their efforts in support of Public Safety.

Yours sincerely,

National Public Safety Telecommunications Council



Ralph Haller, NPSTC Chair

cc: Mike Corey, ARRL
Christopher D Imlay, ARRL