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## **NRPC Raises Concerns with Repurposing of Public Safety 700 MHz Narrowband Channels for Broadband Use**

**Chicago, IL** – Recently, some states have issued RFPs to build and maintain the LTE radio access network in their state if they opt-out of FirstNet. These RFPs reference the 700 MHz narrowband spectrum. The National Regional Planning Council (NRPC) strongly recommends that extreme care and diligence be undertaken before any consideration is made to repurpose public safety 700 MHz narrowband spectrum for broadband use.

The FCC allocated 700 MHz narrowband channels to public safety due to tremendous spectrum congestion in many parts of the country. The original public safety 700 MHz allocation consisted of 24 MHz: 12 MHz for wideband use and 12 MHz for narrowband use. Following enactment of the Middle Class Tax Relief Act of 2012, and band realignment by the FCC, 12 MHz is now licensed to FirstNet for the Nationwide Public Safety Broadband Network, and the remaining 12 MHz is allocated for state and local narrowband use.

The network architecture used to deploy broadband networks is very different than the network architecture used to deploy narrowband networks, leading to significant interference potential between the two uses. Accordingly, there is presently a guard band between the FirstNet and 700 MHz narrowband spectrum, as well as FCC technical rules designed to minimize the potential for interference.

The 700 MHz narrowband spectrum is further divided between state agency use on a geographic basis (State License), and local agency use on a site-by-site basis pursuant to RPC plans (General Use). The FCC has also designated certain 700 MHz narrowband channels for nationwide interoperability, deployables, itinerant, and air-to-ground uses. Many public safety licensees have either deployed or are in the process of deploying 700 MHz narrowband systems in each of the 55 regions across the country.

Repurposing public safety 700 MHz spectrum for broadband use could lead to serious consequences.

- 1) Any repurposing of 700 MHz narrowband channels for broadband use would likely create significant interference between new broadband and continued narrowband uses, whether contained within the same RPC region, or between RPC regions.
- 2) 700 MHz RPCs are charged with spectrum management for site-based 700 MHz narrowband public safety spectrum. Should repurposing of the band to broadband take place in some areas but remain narrowband in others, it would be nearly impossible to coordinate such operations without leading to significant inefficiencies. The cascading effect of just one region reallocating their spectrum to broadband could prove to be catastrophic to adjacent regions that seek to continue their narrowband operations.
- 3) Any repurposing of 700 MHz narrowband channels for broadband use would also seriously disrupt or completely defeat the interoperability benefits of existing nationwide interoperability channels,

nationwide deployable channels, nationwide itinerant channels, and nationwide air-to-ground channels, as well as State License channels, and General Use frequencies subject to regional planning coordination.

- 4) Further, these channels are distributed throughout the narrowband allocation, making any attempt to consolidate the band to support broadband capabilities at best impractical, if not impossible, without requiring significant regulatory proceedings, high costs, and disruptions to public safety communications networks. There is also no comparable spectrum for 700 MHz narrowband public safety licensees to migrate to.

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The [National Regional Planning Council \(NRPC\)](#) is an advocacy body that was formed in 2007 that supports public safety communications spectrum management by Regional Planning Committees (RPC) in the 700 MHz and 800 MHz NPSPAC public safety spectrum as required by the Federal Communications Commission (FCC). RPCs are made up of public safety volunteer members who dedicate their own time and the time of their agencies to coordinate public safety 700 and 800 MHz spectrum efficiently and effectively for public safety agency applicants in their regions. The NRPC works with FCC-certified frequency coordinators, licensees, applicants, vendors and the Commission, as well as individual RPC regions on a regular basis.