

## **IAFC Communications Committee**

### **T Band Talking Points**

On February 22, 2012, the President signed Public Law 112-96 which provides for the development of a nation-wide broad band network.

A portion of the law requires the Federal Communications Commission (FCC) to begin auctioning the public safety T-Band spectrum (470.00 – 512.00 MHz) by February 2021 and clear all public safety operations from the band within 2 years of auction close, (i.e., by early 2023).

This spectrum is used in 11 heavily populated metropolitan areas to support critical public safety (Fire, EMS and Police) communications and provide regional interoperability among first responders. These areas are:

- Boston
- Chicago
- Dallas
- Houston
- Los Angeles
- Miami
- New York
- Philadelphia
- Pittsburgh
- San Francisco
- Washington D.C.

The law provides that auction revenues can be used toward the cost of relocating public safety operations out of the band, the law is silent on identifying a new spectrum home. The law is also silent on the status of thousands of industrial/business users who also utilize this spectrum and whose frequencies are intermingled with public safety frequencies.

In response to the law, the FCC placed a freeze on new and expanded T-Band operations for all licensees, including both public safety and industrial/business entities.

**Key Conclusions** – The following conclusions are based upon the NPSTC T-Band Report. The full NPSTC report can be downloaded from <http://www.npstc.org/>

*1. **SPECTRUM** - Analysis of public safety spectrum bands shows that at least 5 of the 11 metro areas do not have sufficient spectrum in any band to relocate their existing T-Band operations. These areas are the Boston, Chicago, Los Angeles, New York, and Philadelphia metros. The adequacy of relocation spectrum in three additional areas, San Francisco, Washington, D.C., and Pittsburgh is marginal. It is not yet viable nor foreseeable to rely on the planned Nationwide Public Safety Broadband Network (NPSBN) as a likely option to support mission critical voice operations that would be displaced from the T-Band.*

*2. **COST** - The cost to move public safety operations in the 11 metro areas to new frequencies is estimated to be in excess of \$5.9 billion, much greater than the likely auction revenue. If TV and industrial/business were also required to move, that would require additional relocation funding, resulting in the net auction revenue being an even greater negative value.*

*3. **PUBLIC GAIN** – It appears the intent of the law may be to gain additional broadband spectrum for public use. Extensive TV broadcast operations throughout the country and industrial/business systems in 11 metro markets will remain on T-Band channels even if public safety systems are relocated out of the band. These circumstances are unlikely to produce the auction revenue needed for public safety relocation or result in additional broadband spectrum for public use.*

**Given the lack of alternative spectrum, cost of relocation, major disruption to vital public safety services, and likelihood that the spectrum auction would not even cover relocation costs, IAFC agrees with NPSTC that implementing the T-Band legislation is not feasible, provides no public interest benefit, and the matter should be re-visited by Congress.**