

Public Safety Spectrum Alliance (PSSA) Position Paper July 2020

Who We Are?

The Public Safety Spectrum Alliance (PSSA) is an alliance amongst the nation's leading public safety leaders and associations. The PSSA is an initiative of the Public Safety Broadband Technology Association.

Our Mission.

The purpose of the Public Safety Spectrum Alliance is to ensure that first responders nationwide are able to use the most technologically advanced communications capability that meets the difficult, life threatening challenges they face as they protect America. The goal of the Public Safety Spectrum Alliance is to raise awareness in the FCC, Congress and the White House about what our broadband public safety communications needs are, including use of 4.9 GHz and the continued enhancement of FirstNet - the only nationwide, interoperable wireless communications network built for the first responders who protect America.

What Is 4.9 GHz Public Safety Spectrum?

In 2002, largely in response to the September 11th attacks, the Federal Communications Commission allocated fifty megahertz of nationwide spectrum in the 4940-4990 MHz band (4.9 GHz band) exclusively to public safety for fixed and mobile services. Non-traditional public safety entities and the Federal Government may enter into sharing arrangements with eligible traditional public safety entities to use the 4.9 GHz band <u>in</u> support of their missions regarding homeland security and protection of life and property.

Why Is the 4.9 GHz Spectrum So Important to Public Safety?

Public safety is currently the license holder of 50 MHz of broadband-ready spectrum in the 4.9 GHz band. Since the successful deployment of FirstNet in 2018 the use of broadband spectrum has grown within public safety as first responders discover the reliability and capacity of FirstNet. By adding this nationwide spectrum to our network, the FirstNet Authority would ensure that public safety is able to meet its future spectrum needs. Further, FirstNet has made 5G investments a priority of their early reinvestment decisions, which this spectrum could substantially augment.

Why is Public Safety at risk of losing its 4.9 GHz Spectrum?

The FCC controls what happens with the 4.9 GHz public safety spectrum. In previous actions, the Commission allocated and designated 50 megahertz of nationwide spectrum in the 4.9 GHz band to public safety. Currently, the FCC has issued the <u>Sixth Further</u> <u>Notice of Proposed Rulemaking</u> ("FNPRM") to consider promoting additional activity in the 4.9 GHz band while striving to preserve the core public safety purpose of the band.

What is the Risk to Public Safety with this FCC Action?

The FCC is seeking comment on several alternatives for use of and investment in the 4.9 GHz band. Even though the FCC has stated their goal is to ensure that public safety continues to have priority in the band, it is looking to open up the band to additional uses while trying to safeguard public safety users from harmful interference.

While this goal appears reasonable, there is significant risk that this spectrum would be shared and diluted with usage that is incompatible with public safety. Certain shared uses could force the adoption of lower standards that are incompatible with today's public safety needs.

What Are the Benefits of a Fully Operational Public Safety Broadband Network Using 4.9 GHz?

As public safety continues operationalizing their 4.9 GHz spectrum nationwide, it could leverage the prior investments made by FirstNet in our network toward 5G technologies. The added spectrum would also provide a logical path forward for the growing demand for spectrum and preserve public safety's ability to evolve as their need for digital communications mature. From an economic standpoint, an entire new market for low latency high bandwidth devices and applications will emerge, allowing for greater competition, innovation and entrepreneurship. We have seen this to be the case with the deployment of FirstNet with over 100 devices and over 100 unique applications currently available to first responders.

Public Safety Spectrum Alliance Guiding Principles.

- Protect and preserve 4.9 GHz nationwide spectrum for public safety use.
- Assign the 4.9 GHz spectrum to the FirstNet Authority on behalf of Public Safety.
- The FirstNet Authority would be required to develop a spectrum plan for the 50 MHz of public safety spectrum at 4.9 GHz. This plan would allow for the continued support and protection of existing public safety licensees while also allocating a portion of the spectrum for 5G technologies and potentially integrating it with the FirstNet National Public Safety Broadband Network (NPSBN).

Where Should I Go to Get More Information?

Go to <u>www.thepssa.org</u> to learn more. Your support is critical to America's first responders. Please support your first responders by supporting the reassignment of the 4.9 GHz block to the FirstNet Authority.

Frequently Asked Questions:

Q - If the 4.9 spectrum is assigned to the FirstNet Authority, will it be handled like Band 14 in terms of both commercial and public safety use with Priority and Preemption for public safety?

A – The FirstNet Authority Board is comprised of public safety members and commercial experts and exists exclusively to represent public safety interests in governing their broadband network. As such, we have confidence that the FirstNet Authority will appropriately exercise its fiduciary to deploy the 4.9 spectrum to the benefit of public safety.

Q - What will happen to the approximate 3200 current licensees of the 4.9 spectrum?

A – The FirstNet Authority would be required to develop a spectrum plan for the 50 MHz of spectrum at 4.9 GHz that allows for the continued support for existing public safety licensees while also allocating a portion of the spectrum for 5G technologies potentially integrating it with the FirstNet NPSBN.

Q – What are the expectations of the FirstNet Authority if the 4.9 Public Safety Spectrum is assigned to FNA?

A – Because FirstNet exists by and for public safety, we believe the FirstNet Authority would use prudence in determining how to best use the spectrum for public safety.

Q – What is the predominant use of 4.9 today with the current licensees?

A - The predominant use is point-to-point high-speed data/backhaul. As we move the public safety network into more rural settings where fiber assets are often impractical, having this solution available is important for public safety.