

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
) PS Docket No. 13-42
Reallocation of 470-512 MHz (T-Band) Spectrum)
)

To: The Commission

**COMMENTS OF THE
GOVERNMENT WIRELESS
TECHNOLOGY & COMMUNICATIONS ASSOCIATION**

The Government Wireless Technology & Communications Association (“GWTCA”),¹ through counsel and pursuant to Section 1.415 of the Commission’s Rules, 47 C.F.R. §1.415, hereby respectfully submits its Comments in response to the Commission’s Notice of Proposed Rulemaking (“NPRM”) in the above-captioned proceeding.²

The Government Wireless Technology & Communications Association (“GWTCA”) is a non-profit trade association created to advocate on behalf of government and non-government users of wireless technology and communications in the public service industries, such as public transit and public safety. GWTCA’s membership includes government agencies (including municipal Departments of Transportation), manufacturers, providers of third-party communications, facilities owners, engineers and consultants working on a variety of issues impacting represented users.³ As a result, GWTCA has a significant interest in this proceeding.

¹ GWTCA previously submitted Comments in this proceeding on May 9, 2013. In addition, it should be noted that GWTCA is an Associate Member of the National Public Safety Telecommunications Council (“NPSTC”). GWTCA supports the Comments of NPSTC in this proceeding.

² *Notice of Proposed Rulemaking*, PS Docket No. 13-42, released July 6, 2020.

³ www.gwtca.org.

Public safety operations in the T-Band are vital to protecting the public. Review undertaken by GWTCFA and many others demonstrates that there is no alternative spectrum available to relocate public safety T-Band operations. Importantly, even if alternative spectrum were available, it is unlikely that the auction would result in sufficient bidding to pay for GWTCFA's relocation. However, if the Commission engages in an effort to locate alternative spectrum, it must only do so in consideration of all costs and all impacts of that new spectrum on public safety agencies.

WHEREFORE, the premises considered, it is respectfully requested that the Commission act in accordance with the views expressed herein.

Respectfully submitted,

GOVERNMENT WIRELESS TECHNOLOGY
& COMMUNICATIONS ASSOCIATION

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