



May 23, 2024

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

RE: Letter of Support for the Public Safety Spectrum Alliance – Amendment of Part 90 of the Commission’s Rules, WP Docket No. 07-100

Dear Ms. Dortch:

The Nevada Fire Chiefs Association supports the position and comments of the Public Safety Spectrum Alliance (PSSA) regarding the 4.9 GHz spectrum. This spectrum should remain exclusively for public safety use. The association is against sharing this spectrum with commercial users and decentralizing its management to individual states. They advocate for placing the 4.9 GHz spectrum under the stewardship of the FirstNet Authority. Centralized management is especially crucial in states like Nevada, which have vast rural areas where emergency services rely heavily on mutual aid between state, local, tribal, and federal responders. Consistent communication platforms are essential, and the potential for a patchwork of different communication systems should the 4.9 GHz spectrum not be assigned to the FirstNet Authority would be detrimental to effective emergency response.

The PSSA has advocated for, and supports the following key principles for management and use of the 4.9 GHz band, and urges the Commission to adopt the same:

- The Commission must protect and preserve the 4.9 GHz nationwide spectrum for public safety use.
- Incumbent public safety licensees must be protected.
- The Commission should assign the 4.9 GHz spectrum to a single nationwide licensee on behalf of public safety. This will prevent an unwieldy patchwork of deployments across the nation and create the economies of scale necessary to speed deployment by maintaining a consistent set of build out regulations and creating the necessary incentives for the proliferation of new equipment and technologies.
- The FirstNet Authority, as the entity tasked by Congress to (i) ensure the deployment of, and (ii) oversee, the NPSBN, commonly known as FirstNet, has demonstrated that it has both the experience and relationships with public safety nationwide to not only successfully deploy a nationwide network for public safety, but to have done so in a manner that has fostered nationwide competition of products and services for public safety, and provided improved tools

Nevada Fire Chiefs Association

Mailing Address: 3827 S. Carson Street, #197 Carson City, Nevada 89701
(775) 720-9874 kelli@nvfirechf.org
www.nvfirechf.org



at lower cost to our nation's first responders. The FirstNet Authority's Board of Directors is comprised, among others, of active and retired public safety executives involved in the ongoing oversight of the NPSBN. No other entity managing spectrum has such strong public safety oversight. The Commission should leverage that experience and assign the nationwide license to FirstNet Authority.

- The Commission should not allow incompatible technologies that will cause interference to public safety.
- The Commission should select a nationwide band manager to work in conjunction with, and at the behest of the FirstNet Authority to help coordinate deployment and ongoing management of the band.

As such, we encourage the FCC to support the position and key principles as outlined by the PSSA.

Sincerely,

Dave Cochran, President

Nevada Fire Chiefs Association
cochrand@reno.gov

Nevada Fire Chiefs Association

Mailing Address: 3827 S. Carson Street, #197 Carson City, Nevada 89701
(775) 720-9874 kelli@nvfirechf.org
www.nvfirechf.org