

THE CALIFORNIA TEST SHARING PLAN

Submitted by C.P.R.A. Chapter of APCO

Those members of APCO who attended the National Conference in Chicago heard *Mr. William Watkins*, Chief Frequency and Treaty Division, Office of the Chief Engineer, F.C.C., state that in three months since the Report and Order in Docket 15399 had become effective (May 10, 1965) not a single application had been received requesting a secondary frequency assignment. He asked why.

An answer was forthcoming. *Bob Brooking* and *Tony Gain* explained that certain limitations made it impossible to even apply for such an assignment. *Don Griffin*, President of CPRA took the floor to explain that CPRA is very interested in the feasibility of sharing and that the organization is hoping that something useful will come from the Docket.

Don went on to explain that CPRA had conducted a survey among the governmental entities in Southern California to gain information on this matter and that as soon as the ad-hoc committee had completed its work the information would be submitted to the F.C.C.

The Report and Order on Docket 15399 was first revealed by *John McCue* at the Joint California APCO Conference on March 25, 1965. The Report and Order was released officially on April 6, 1965. It did not take long to see that even applying for a secondary frequency would be most difficult.

For one thing most of the larger systems, both county and city, are desirous of obtaining additional frequencies to reduce their load per channel, but there are no more frequencies available in their own service and they must relinquish a frequency to gain one through secondary assignment. This would leave a net gain of nothing.

However, we felt that it was very

necessary for us to make every effort to effect some gain, if at all possible, through the technique of secondary sharing. To help implement such a course, *President Griffin* formed an ad-hoc committee at the May, 1965 meeting of CPRA and charged this committee with the task of developing a letter and questionnaire to be sent to the top level management of 13 counties and 197 cities in Southern California. The questionnaire was to cover Police, Fire, Local Government, Highway Maintenance and other Services in which governmental entities were licensed.

Some by-products of the letter and questionnaire were that top level management has become more aware of the Public Safety Radio Services, the spectrum problems they face and the fact there is an organization which is trying to do something about the problem.

As the final part of this study the ad-hoc committee has sent a letter and report to the F.C.C. It is reproduced here for your study.

September 10, 1965

The Federal Communications Commission,
Washington, D. C. 20554
Gentlemen:

The questionnaire on secondary frequency sharing, sent by C. P. R. A. to 210 cities and counties in Southern California, was well received judging from the percentage and number returned as indicated in the enclosed report. This, in itself, should make the results representative of the area of C. P. R. A. frequency recommendation responsibility.

Most requests for frequency recommendations directed to this organization are for new systems or established systems in larger communities which need separating, requiring another frequency and retention of their existing frequency, in order to successfully expand communications. The Frequency Sharing Plan was not designed for the above mentioned

situation in its present form.

It is our considered opinion that the Commission made the rule change to make it possible for systems which are in such an overcrowded state they will resort to drastic means to ease the congested situation. Although overcrowded conditions exist in the area, they must not be considered by the entities as drastic as the restrictions placed on sharing. Both C. P. R. A. and the entities in this area must be dedicated in working with the F. C. C. in an effort to find a realistic solution to our problems and alleviate objections whenever possible.

Very truly yours,
Donald A. Griffin
President

September 10, 1965

Report of California Public-Safety Radio Association on Survey Conducting re Feasibility of Secondary Frequency Sharing. Docket #15399

The Federal Communications Commission, Washington, D. C. 20554
Gentlemen:

The California Public-Safety Radio Association, hereinafter referred to as CPRA, being mindful of the fact the Federal Communications Commission adopted Docket #15399 as one possible means of alleviating the heavy congestion on frequencies assigned to the Public Safety Services and, having taken cognizance of published reports as of July 1, 1965, that no applicants had requested secondary frequency assignments, considered means of ascertaining why licensees were not making use of the provisions of the docket. While individual members of CPRA advanced definite reasons for the lack of response, it was felt that before drawing any general conclusions in this matter, the most thorough inquiry possible, within the means of CPRA, should be undertaken.

How to accomplish such an inquiry was the subject of considerable discussion and a survey, requesting the return of a questionnaire, was considered to be the most likely means of obtaining the desired information.

CPRA draws its membership from and represents the Public Safety Services in the 13 most southernly counties in California, starting with a line across the northern boundaries of the counties of San Luis Obispo, Kern and Fresno. Available information reflected that, besides the 13 counties, there are 197 cities in the area. On this basis, letters were directed to the Administrative Officers of these cities and counties. This letter briefly advised of the congestion in the public Safety Services frequency assignments and explained the reason for the survey. Included with the letter was a copy of the FCC appendix to docket #15399 setting forth the requirements to be met in filing for a secondary frequency. In addition, a one page questionnaire was enclosed, the return of which was requested

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within a specific period.

The questionnaire requested information as to:

a. Which 150/450 mcs. frequencies assigned to the police, fire, local government and other Public Safety Services of their agency were considered to be congested?

b. Would their agency consider applying for a secondary frequency under the conditions and limitations in the appendix?

c. If their answer to the latter was negative, to which of the limitations and conditions did they object?

d. Any comments they might have considering this matter.

In addition to the above, information was requested as to the number of base stations, including control and mobile relays and the number of mobiles and portables in use in their police, fire, local government and other Public Safety Services on the low, high and ultra high frequency bands.

The results of this inquiry are set forth below:

1. Number of questionnaires sent: 210. No. returned: 91. Percentage: 43.3%.

(At first glance it may be thought that the percentage of returns is low. On the other hand, when it is considered that some of the smaller cities are still without radio facilities and that in a great many instances, the radio services of other cities are handled by the county in which they are located, it is believed that a very high percentage of returns were received, indicating the great interest shown by the Administrators of the agencies concerned.)

2. Number of services, of the 91 reporting, who stated they consider their frequency is congested:

Police: 30 or 32.9%. Fire: 23 or 25.3%. Local Gov't.: 25 or 27.4%.

(In this connection it might be noted that these figures include some who reported on their low band frequencies, although this was not asked for.)

3. Number of agencies who stated they would not consider applying for a secondary frequency: 44 or 48.3%.

Number who stated they would consider applying for a secondary frequency: 8 or 8.7%.

4. Those who stated they would not consider applying for a secondary frequency were asked to give the reason. Generally the answers were because of the conditions and limitations in paragraphs 89.225, 89.227 and 89.231 of the appendix. Many of those who replied offered comments. As of possible interest, some are repeated below in abbreviated form:

a. Cost of change over on a temporary basis — can't afford to risk the taxpayers funds.

b. Have no recourse if forced to move from secondary channel.

c. Time requirements are too restrictive.

d. Secondary frequency, if available at all, should be assigned on a permanent basis.

e. Program offers no relief to those using low band frequencies.

The figures obtained relative to channel loading are considered interesting. It should be borne in mind that they cannot be considered complete because, as noted before, not everyone answered the questionnaire. These figures are as follows:

Low Band	Base	Mobiles	Portables
Police			
(153 channels allotted)	81	1734	167
Fire			
(53 channels allotted)	114	1062	186
Local Gov't.			
(30 channels allotted)	49	377	4
Other	70	319	10
High Band			
Police			
(66 channels allotted)	152	3267	302
Fire			
(30 channels allotted)	203	1727	278
Local Gov't.			
(57 channels allotted)	111	1472	97
Other	322	783	120
Ultra High Band			
(38 channels allotted for all)			
Police	2	0	0
Fire	0	0	0
Local Gov't.	39	332	2
Other	42	211	3

The California Public-safety Radio Association feels that the results of this survey have been well worth the time and expense involved in conducting it and appreciates the opportunity to submit the results thereof. It is felt that it clearly shows that there is congestion on the frequencies assigned to the Public Safety Services in this area; that the secondary Frequency sharing plan, in its present form, does not appear to be a workable solution and that the Administrators of the agencies involved cannot afford to gamble with the tax money with which they are charged. It is hoped that the information contained herein will be of some possible assistance to the Commissioners, and others, in their study of this acute problem.

Respectfully submitted by the Survey Committee:

EDDIE SIMON,
Communications Engineer,
City of San Diego

MAX ELLIOTT,
Chief Radio Engineer,
County of Orange.

LESLIE M. WALKER,
Chief Electronics Engineer,
County of Los Angeles.

ANTHONY J. GAIN,
Chief, Electronics Division,
City of Los Angeles.

VAUGHN I. PARRY,
Chairman,
Frequency Advisory Committee.



LETTER BOX

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TIN, I appointed a special Committee (C.O.L.E.) for the express purpose of establishing a means of liaison with the President's Commission in anticipation that APCO would be called upon for its expert communications services in the law enforcement field.

In my conferences with Mr. Skoler and Mr. Sagalyn I attempted to present the status of public safety space communications in a fair and objective manner. The attached copy of the letter to Mr. Skoler is representative of the comments made at those conferences. I trust you will agree that they are factually based.

I look forward to seeing you again during the coming session of LMAC in Washington.

Respectfully,
J. Rhett McMillian, Jr.
President, A.P.C.O.

JRM/mas

cc: Msrs. Voranburg
Sagalyn



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with IMSA lending financial, technical and political support to APCO's activities.

In the many deliberations of the Public Safety Communications Council, FCC Docket hearings and other such matters, there has never been a serious area of disagreement between the two organizations. Both organizations are faced with the problem of fighting an "all-out" battle in the interests of Public Safety Communications against many groups far better equipped financially, politically and otherwise. Both organizations must fight this battle with limited budgets, volunteer personnel, and similar limitations. The only arguing point which seems to have strength for the Public Safety side is the emergency nature of both Police and Fire operations, and their responsibilities in the protection of Public Life and Property.

I, as a member of both organizations, therefore strongly urge you to work closely together and through whatever means possible (a joint meeting of IMSA Directors and APCO Executive Board members might serve) attempt to achieve a closer affiliation of the two groups toward the end of a more unified and coordinated presentation of the Public Safety Radio Communications problems. Economies effected through elimination of much of the duplicate travel, coordination expenses and similar advantages should permit the application of more funds toward a stronger effort in LMAC, before the Commission, and in the general programs for the improvement of Public Safety Communications.

Yours truly,
Jorman I. Koski, Supervisor
Communication Division

JIK/ws

