



**AGENDA**  
**LOS ANGELES REGIONAL**  
**INTEROPERABLE COMMUNICATIONS SYSTEM AUTHORITY**

**REVISED**

**LEGISLATIVE COMMITTEE MEETING**

Wednesday, April 17, 2013 – 1:00 p.m.

LA County Sheriff's Department Headquarters, Media Conference Room  
4700 W. Ramona Blvd., Monterey Park, CA 91754

**AGENDA POSTED: April 12, 2013**

Complete agendas are made available for review on the Authority's website at <http://www.la-rics.org>.

---

1. CALL TO ORDER
2. ANNOUNCE QUORUM – Roll Call
3. APPROVAL OF Legislative Committee Meeting Minutes for March 28, 2013.

**Attachment: Item 3**

4. NEW BUSINESS – ACTION ITEM  
Legislative Standards and Priorities

**RECOMMENDATION:**

It is recommended that your Committee accept the attached response to the Federal Communications Commission's Public Notice, DA 13-187, dated February 11, 2013.

**Attachment: Item 4**

5. PUBLIC COMMENT
6. ADJOURNMENT



#### LEGISLATIVE COMMITTEE MEETING INFORMATION

Members of the public are invited to address the LA-RICS LEGISLATIVE COMMITTEE on any item on the agenda prior to action by the LEGISLATIVE COMMITTEE on that specific item. Members of the public may also address the LEGISLATIVE COMMITTEE on any matter within the subject matter jurisdiction of the LEGISLATIVE COMMITTEE. The LEGISLATIVE COMMITTEE will entertain such comments during the Public Comment period. Public Comment will be limited to three (3) minutes per individual for each item addressed, unless there are more than ten (10) comment cards for each item, in which case the Public Comment will be limited to one (1) minute per individual. The aforementioned limitation may be waived by the LEGISLATIVE COMMITTEE's Chair.

*(NOTE: Pursuant to Government Code Section 54954.3(b) the legislative body of a local agency may adopt reasonable regulations, including, but not limited to, regulations limiting the total amount of time allocated for public testimony on particular issues and for each individual speaker.)*

Members of the public who wish to address the LEGISLATIVE COMMITTEE are urged to complete a Speaker Card and submit it to the LEGISLATIVE COMMITTEE Secretary prior to commencement of the public meeting. The cards are available in the meeting room. However, should a member of the public feel the need to address a matter while the meeting is in progress, a card may be submitted to the LEGISLATIVE COMMITTEE Secretary prior to final consideration of the matter.

It is requested that individuals who require the services of a translator contact the LEGISLATIVE COMMITTEE Secretary no later than the day preceding the meeting. Whenever possible, a translator will be provided. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or services may be provided upon request. To ensure availability, you are advised to make your request at least 72 hours prior to the meeting you wish to attend.

(323) 881-8291 or (323) 881-8295

SI REQUIERE SERVICIOS DE TRADUCCION, FAVOR DE NOTIFICAR LA OFICINA CON  
24 HORAS POR ANTICIPADO.



# MEETING MINUTES

## LOS ANGELES REGIONAL INTEROPERABLE COMMUNICATIONS SYSTEM AUTHORITY

### LEGISLATIVE COMMITTEE MEETING

Thursday, March 28, 2013 • 2:00 p.m. – 4:00 p.m.

LA County Fire Department Headquarters, Training Room 25  
1320 N. Eastern Ave., Los Angeles, CA 90063

---

---

#### **Official Voting Members Present:**

**Stephen Sotomayor**, representative for the City of Los Angeles CAO  
**Greg Doyle**, representative for the City of Los Angeles Police Department  
**Joshua Drake**, representative for the City of Los Angeles Chief Legislative Analyst Office  
**Olyvia Rodriguez**, representative for the County of Los Angeles Chief Executive Office  
**Mitch Tavera**, representative for the City of Culver City, At Large Seat #2  
**Mark S. Wilkins**, representative for the Los Angeles County Sheriff's Department

---

#### **Representatives For Official Voting Members Present:**

**George Sandoval**, representing Nancy Ramirez for the Los Angeles School Police Department  
**Rowena Magana**, representing Gerardo Pinedo for the County of Los Angeles DHS  
**Chris Bundeson**, representing Daryl Osby, Chair, for the County of Los Angeles Fire Department

---

#### **Official Voting Members Absent:**

**June Gibson**, representative for the City of Los Angeles Fire Department  
**Daryl Osby, Chair**, representative for the County of Los Angeles Fire Department  
**Nancy Ramirez**, representative for the Los Angeles School Police Department  
**Gerardo Pinedo**, representative for the County of Los Angeles DHS  
**Vacant**, representative for the City of Long Beach  
**Timothy Scranton**, representative for the Los Angeles Area Fire Chiefs Association  
**Scott Pickwith**, representative for the Los Angeles County Police Chiefs Association  
**Mark Alexander**, representative for the California Contract Cities Association  
**Mary Giordano**, representative for the City of Torrance, At Large Seat #1  
**Greg Simay**, representative for the City of Burbank, At Large Seat #3  
**Vacant**, representative for the City of Pasadena, At Large Seat #4



1. CALL TO ORDER
  
2. ANNOUNCE QUORUM – Roll Call taken by Committee Vice Chair Olyvia Rodriguez; no quorum available discussion only. Alternate Committee Member Rowena Magana arrived late, therefore quorum was reached 10 minutes into the meeting.
  
3. APPROVAL OF Legislative Committee Meeting Minutes for February 21, 2013.  
**MOTION APPROVED**
  
4. NEW BUSINESS – DISCUSSION ITEM

4.1 Public Notice from the FCC

Committee Member Mark Wilkins stated that the Committee needs to recommend that the JPA Board take some action on the FCC's Request for Public Comment. He also pointed out that there are some issues that should be discussed, such as: (1) the fiscal impact of having to vacate T-Band and move on to an alternative spectrum; (2) how that impacts LA-RICS; and (3) having only two years to vacate the spectrum once the spectrum is auctioned. Aside from the cost of vacating the spectrum, there should be further discussion on the possibility of getting funding in advance.

Late arrival of Alternate Committee Member Magana allowed quorum to be reached.

Updates

Executive Director Pat Mallon stated that the FCC has asked for comments on the T-Band auction as is required by H.R. 3630, now Public Law 112.96. LA-RICS has encouraged all individual public safety agencies to respond on their own behalf. LA-RICS should respond as an individual entity.

Executive Director Mallon mentioned the NPSTC analysis of the cost of the T-Band migration. The cost for the 11 metro areas to move to new frequencies is estimated to be around \$5.9 million. The report also estimated that it would take \$856 million for the LA area public safety agencies to move to another spectrum. It is a notional cost estimate that is not based upon or influenced by the ongoing LA-RICS LMR procurement.

Executive Director Mallon stated that if the Public Safety system is rolled out by 2021 and with sufficient 700 MHz spectrum, LA-RICS would be able to migrate off into the T-Band, but only if the National Public Safety Broadband Network is deployed in the Los Angeles area and provides non-critical voice and data communications. There is also an incremental cost involved in building the hybrid system because of the requirement for two systems, one on T-Band as well as another on the 700 MHz spectrum. One of the considerations that would be up for discussion is that H.R. 3630



mentioned some funding for migrating off the T-Band. LA-RICS should encourage Congress to consider early funding for early migration efforts.

Ron Wong, LA-RICS Technical Support, stated that the FCC is not really in a position to offer spectrum that Congress has designated for other services. They will need to go back to Congress with their recommendations. In enacting the requirements of PL 112.96, Congress did not ask for input on what to do with the incumbent commercial users, primarily on channel 14, and they do not address what they are going to do with them. In the NPSTC report they also questioned if there would be enough revenues generated from the spectrum auction to produce sufficient funds to move public safety to another spectrum.

Committee Member Wilkins continued that he wanted to add to the funding discussion. Does it provide enough funding for relocation off of T-Band to other spectrum? What if that funding comes after the auction (after 2021)? T-Band should be vacated long before that date. Therefore, if LA-RICS is going to recommend a response from the Board, that should be one of the issues addressed.

Vice Chair Rodriguez agreed with Committee Member Wilkins' comments on the FCC's role in terms of implementation of the law. Should there be any changes required, it will be necessary to have Congressional action and approval.

Committee Member Stephen Sotomayor questioned if the NPSTC report, when looking at different regions, looked at available spectrum and alternate frequencies. Does it take into account spectrum efficiencies or did they take a snap shot as it looks today? For example, did they ever look at Phase 2 technology being applied and to increased capacity or were they just looking at a snapshot on a one-for-one channel replacement.

Mr. Wong stated that they looked at it in terms of total bandwidth. He also commented that the law only affects public safety users. Industry or commercial use channels were not addressed in the legislation. There are some public safety agencies that do use the commercial frequencies, so technically they will be impacted as well.

Committee Member Wilkins stated that Committee should draft a response for review and recommendation to the Board. There are two items to address: 1) should this Committee recommend to the Board that they make a response; and, 2) what does this Committee want to recommend.

Executive Director Mallon stated that there is time in April to formalize a recommendation before the next JPA meeting on May 2, 2013

**DRAFT WILL BE PREPARED BY LA-RICS STAFF.**



4.2 LA-RICS Legislative Committee Meeting Schedule for 2013

Vice Chair Rodriguez asked if everyone agreed with the meeting schedule.  
**MOTION APPROVED**

5. PUBLIC COMMENT – None

6. ADJOURNMENT AND NEXT MEETING

Vice Chair Rodriguez adjourned the meeting at 2:44 p.m. The next meeting is to be determined.



# LOS ANGELES REGIONAL INTEROPERABLE COMMUNICATIONS SYSTEM AUTHORITY

2525 Corporate Place, Suite 200  
Monterey Park, California 91754  
(323) 881-8291

PATRICK J. MALLON  
EXECUTIVE DIRECTOR

April 17, 2013

Legislative Committee Members  
Los Angeles Regional Interoperable Communications System ("LA-RICS") Authority  
(the "Authority")

Dear Members:

## **COMMITTEE RECOMMENDATION ON COMMENTS TO THE FEDERAL COMMUNICATIONS COMMISSION PUBLIC NOTICE, DA 13-187 (February 11, 2013)**

### **RECOMMENDED ACTIONS**

It is recommended that the Committee:

Accept the attached response to the Federal Communications Commission's Public Notice, DA 13-187, dated February 11, 2013.

### **BACKGROUND**

On February 22, 2012, President Barack Obama signed into law PL 112.96 (HR 3630) the Middle Tax Relief and Jobs Creation Act of 2012 (the "Act"). Within this legislation, Section 6013 provides that, not later than nine years, the Commission shall (1) "reallocate the spectrum in the 470-512 MHz band... currently used by public safety eligible," and (2) "begin a system of competitive bidding under Section 309(j) of the Communications Act of 1934 to grant initial licenses for use of the spectrum." It provides that "relocation of public safety entities from the T-Band Spectrum" shall be completed no later than two years after completion of the system of competitive bidding, and that proceeds from the auction of T-Band "shall be available to the Assistant Secretary [of Commerce for Communications and Information] to make grants in such sums as necessary to cover relocation costs for the relocation of public safety entities from the T-Band spectrum."

The spectrum at 482-488 MHz is allocated exclusively for public safety in Los Angeles and provided the core spectrum for the Los Angeles County Sheriff's Department and other agencies' communications systems. Portions of 470-476 and 506-512 MHz are also assigned to public safety agencies in the region. Additionally, pursuant to a waiver, the County of Los Angeles also has licenses to operate a new public safety system in 476-482 MHz as part of LA-RICS.

In late 2012, the National Public Safety Telecommunications Counsel (NPSTC) undertook a study of the cost for relocation from the T-Band and alternative spectrums for such move. The LA-RICS project was an integral participant in developing the comprehensive analysis. The NPSTC T-Band Report was ultimately released to the Federal Communications Commission (FCC).

On February 11, 2013, the FCC issued a Public Notice requesting comment on the implementation of the Section 6103 of the Act. Responses to the notice are due May 13, 2013.

**ITEM 4 ATTACHMENT**

**PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION**

The project staff has developed a draft response to the Public Notice which outlines the following areas:

1. In 2008, the FCC granted Los Angeles County a waiver to use 6 MHz of additional T-Band spectrum based on the Commission's findings that there is not enough spectrum in other bands to accommodate the requirements of Los Angeles area public safety agencies.
2. LA-RICS explored a variety of options that would allow it to continue to develop a new interoperable voice communications system. LA-RICS determined the only viable approach was to deploy a hybrid 470-512 MHz/700 MHz narrowband system.
3. While the approach would provide a full public safety grade communications system in both bands, and allow for a gradual migration from 470-512MHz within the time period, it would be very expensive and complex.
4. Once all public safety agencies complete the full migration from the 470-512 MHz spectrum, there is not sufficient 700 MHz public safety narrowband spectrum to support anticipated capacity requirements. LA-RICS has filed a Request for Waiver seeking access to 700 MHz narrowband reserve spectrum to supplement the capacity. However, LA-RICS strongly supports efforts to allocate new spectrum resources for public safety to address the loss of the T-Band.
5. Implementing the hybrid T-Band/700 MHz narrowband approach will be significantly more expensive and complex than the exclusive T-Band system originally contemplated. LA-RICS would strongly support new and timely funding to offset the cost associated with forced relocation from the T-Band.

**FISCAL IMPACT/FINANCING**

None.

**FACTS AND PROVISIONS/LEGAL REQUIREMENTS**

The Authority's counsel has reviewed the recommended action.

**AGREEMENTS/CONTRACTING**

Not applicable.

Respectfully submitted,

  
PATRICK J. MALLON  
EXECUTIVE DIRECTOR

PJM:pjm

Attachments

c: Counsel to the Authority



# DRAFT

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of )  
 )  
OPTIONS FOR 470-512 MHz SPECTRUM ) PS Docket 13-42  
 )

**COMMENTS OF THE  
LOS ANGELES REGIONAL INTEROPERABLE COMMUNICATIONS SYSTEM  
JOINT POWERS AUTHORITY**

The Los Angeles Regional Interoperable Communications System Joint Powers Authority (“LA-RICS”) hereby submits the following comments in response to the Commission’s *Public Notice*, DA 13-187 (February 11, 2013), in the above-captioned proceeding concerning implementation of the Section 6103 of the Middle Class Tax Relief and Job Creation Act of 2012 (the “Act”) as it applies to the 470-512 MHz band (the “T-Band”).<sup>1</sup>

LA-RICS was formed by the City of Los Angeles, County of Los Angeles and more than 80 other municipalities and public sector entities. LA-RICS has been working on a new multi-agency, interoperable radio communications system that will serve the over 10 million residents of the Los Angeles metropolitan area, a population that is greater than 42 of the 50 states. LA-RICS will support a total user population of more than 34,000 first responders and up to 17,000 secondary responders. As the Commission is aware, LA-RICS had been planning for its voice communications platform to operate in portions of the T-Band, which has long been the principal

---

<sup>1</sup> As explained in the *Public Notice* (footnotes omitted):

Section 6103 provides that, not later than nine years after the date of enactment, the Commission shall (1) “reallocate the spectrum in the 470-512 MHz band ... currently used by public safety eligibles,” and (2) “begin a system of competitive bidding under Section 309(j) of the Communications Act of 1934 (47 U.S.C. 309(j)) to grant new initial licenses for use of the spectrum.” It provides that “relocation of public safety entities from the T-Band Spectrum” shall be completed not later than two years after completion of the system of competitive bidding, and that proceeds from the auction of T-Band spectrum “shall be available to the Assistant Secretary [of Commerce for Communications and Information] to make grants in such sums as necessary to cover relocation costs for the relocation of public safety entities from the T-Band spectrum.”

frequency band for Los Angeles area public safety agencies.<sup>2</sup> LA-RICS is not itself an frequency licensee, though it will utilize frequencies provided by its member jurisdictions.

The National Public Safety Telecommunications Council (“NPSTC”) recently issued a comprehensive report on the T-Band (NPSTC Report).<sup>3</sup> The NPSTC Report includes extensive data and analysis that responds to many of the questions posed by the Commission in the *Public Notice*. LA-RICS was an integral participant in developing the NPSTC Report and supports its findings and recommendations. We provide these additional comments in further response to the *Public Notice*.

The Commission seeks comments as to whether there is other spectrum available to accommodate T-Band licensees forced to relocate because of Section 6103 of the Act. That issue has already been largely addressed for Los Angeles. In 2008, the Commission granted Los Angeles County a waiver to use 6 MHz of additional T-Band spectrum, based on the Commission’s findings that there is not enough spectrum in other bands to accommodate the requirements of Los Angeles area public safety agencies.<sup>4</sup> While the 700 MHz broadband spectrum was not available at that time, that spectrum will not in any event accommodate mission-critical voice communications in the foreseeable future.<sup>5</sup>

---

<sup>2</sup> The spectrum at 482-488 MHz is allocated exclusively for public safety in Los Angeles and provides the core spectrum for the Los Angeles County Sheriff’s Department and other agencies’ communications systems. Portions of 470-476 MHz and 506-512 MHz are also assigned to public safety agencies in the region. Pursuant to a waiver, the County of Los Angeles also has licenses to operate a new public safety system in 476-482 MHz as part of LA-RICS. See County of Los Angeles, *Order*, DA 08-2823, 23 FCC Rcd 18389 (2008).

<sup>3</sup> National Public Safety Telecommunications Council, *T-Band Report* (Mar. 15, 2013). NPSTC is filing the Report in this docket. A copy can also be found at: [http://www.npstc.org/download.jsp?tableId=37&column=217&id=2678&file=T\\_Band\\_Report\\_20130315.pdf](http://www.npstc.org/download.jsp?tableId=37&column=217&id=2678&file=T_Band_Report_20130315.pdf)

<sup>4</sup> County of Los Angeles, *Order*, DA 08-2823, 23 FCC Rcd 18389 (2008).

<sup>5</sup> See NPSTC Report at 31.

Section 6103 of the Act has forced LA-RICS to explore a variety of options that would allow it to continue development of a new interoperable voice communications system to replace the aging radio equipment and systems currently in use across the metropolitan area. LA-RICS has determined that, absent repeal or modification of Section 6103, the only viable approach is to deploy a hybrid 470-512 MHz/700 MHz narrowband system, though it would be a very expensive and complex deployment. A hybrid approach would provide a logical path to operate a full public safety grade communications system in both bands, and allow for a gradual migration from 470-512 MHz within the time period required by the Act. However, there is not adequate 700 MHz public safety narrowband spectrum currently allocated for this interim approach to succeed. Thus, LA-RICS has filed a Request for Waiver seeking access to 700 MHz narrowband reserve spectrum.<sup>6</sup> Even if granted, however, there will still be a substantial spectrum shortfall both for the interim period and especially in the long run should public safety be forced to relinquish the T-Band as currently required by law. Therefore, LA-RICS would strongly support efforts to allocate new spectrum resources for public safety to address the loss of the T-Band.

Implementing the hybrid T-Band/700 MHz narrowband approach will be significantly more expensive and complex than the exclusive T-Band system originally conceived by LA-RICS. Additional funding will be needed, well in advance of any forced relocation from T-Band or distribution of auction revenue. In any event, as discussed in the NPSTC Report, any potential auction revenue from the T-Band will be severely limited by other spectrum allocations

---

<sup>6</sup> Request for Waiver of Section 90.531(b)(2) filed by Los Angeles Regional Interoperable Communications System Joint Powers Authority (Dec. 7, 2012); *Public Notice*, DA 13-39 (Jan. 11, 2013).

and uses in the band.<sup>7</sup> Thus, LA-RICS would strongly support new and more timely funding to offset the costs associated with forced relocation from the T-Band.

#### CONCLUSION

LA-RICS has identified a system design that accommodates, to the extent possible, the forced migration out of the T-Band, though it assumes that additional spectrum and funding is made available. Therefore, LA-RICS urges the Commission and other policy makers to address the issues discussed above and in the NPSTC Report, with the goal of promoting interoperable radio communications to serve the needs of first responders and the public.

Respectfully submitted,

---

<sup>7</sup> NPSTC Report at 59.