



American Association of State Highway and Transportation Officials  
Association of Public-Safety Communications Officials, International  
Forestry Conservation Communications Association  
International Municipal Signal Association

122 Baltimore Street, Gettysburg, Pennsylvania 17325

February 3, 2012

Adm. James A. Barnett (Ret.), Chief  
Public Safety and Homeland Security Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Dear Adm. Barnett,

The four public safety frequency advisory committees meeting collectively as the Public Safety Communications Council (PSCC) held their regularly scheduled meeting on January 17, 2012. Among the items discussed were reports of harmful interference being received by public safety users around the country from currently operating TDMA systems. The interference received can generally be classified as an instance where a channel was successfully shared when the usage averaged around 10% and now either approaches or is at a 100% duty cycle. Another observed source of interference is false triggering of certain CTCSS tones in analog receivers by (we presume) harmonics of the TDMA framing rate which fall on or are very close to certain CTCSS tone frequencies, thus opening receivers and causing constant noise in affected systems. The effect on systems guarded by CDCSS is not known. Potentially, falsing of the CDCSS 134 Hz end-of-message word may paradoxically mute in-progress communication.

The PSCC has had discussions with a predominant manufacturer of these systems and the results of testing to identify the causes and obtain a solution have not been conclusive. The PSCC requests more testing be done on the impact of this new technology to legacy analog and digital systems already widely deployed. Until such testing is completed and a determination is made as to the procedures which should be followed in coordinating applications using 7K6 modulation, the PSCC will implement the following procedure unless otherwise directed.

For a period not to exceed 90 calendar days beginning February 6, 2012, and in accordance with §90.175(b) no applications utilizing TDMA emissions in the VHF band will be deemed coordinated and recommended for licensing having an ERP greater than 10 watts for any fixed location. This limitation includes sites classified as FX1, including those fitting the 6.1 meter category. The PSCC also requests the Telecommunications Industry Association (TIA) conduct the testing of all currently available TDMA hardware operating in the VHF band to assess their impact on existing equipment. We further request the Commission ask the Telecommunications Industry Association to complete the testing and development of coordination guidelines within 90 days.

Sincerely,

A handwritten signature in black ink, appearing to read 'William K. Brownlow', is written over a light blue horizontal line.

William K. Brownlow, Secretary  
AASHTO

Copies: Mr. Doug Aiken, IMSA, President, LMCC  
Mr. Robert Speidel, Telecommunications Industry Association