

**CONCURRING STATEMENT  
OF  
COMMISSIONER JAMES H. QUELLO**

**RE: Technical Compatibility Protocol Standards for Equipment  
Operating in the 800 MHz Public Safety Bands.**

By today's action the Commission has missed another opportunity to address the needs of the public safety services. My dismay is tempered slightly by the fact that a further notice of inquiry will examine the standards issue for the next generation of public safety technology. In the meantime, by failing to address the standards issue for analog trunked technology, the Commission continues to foster the spread of technology that requires spectrum inefficient conventional channels to provide interoperability. Furthermore, as commenters stated, failure to require a single trunking standard drives up the cost of radio equipment used by public safety services and this ultimately affects the taxpayer. The Commission's response to the issue of equipment cost is to say that "there are a number of manufacturers producing land mobile radio equipment at this time," implying a competitive market for public safety 800 MHz trunked radios. (See, para. 36.) What the Commission fails to address is the question of whether a competitive market exists for the 800 MHz trunked radio market. Additionally, the Commission fails to mention that there is no competitive market for add-on equipment for trunked technology, since each manufacturer produces equipment to its respective protocol. Establishing a trunking standard would create a competitive marketplace for add-on equipment, thus driving down the cost of such equipment.

The Commission argues that it is too late to develop a standard for analog trunk technologies. I disagree with the majority on this point. It is not too late. There are no public safety services currently operating in the 6 MHz allocated to public safety services for the national public safety plan. Furthermore, it will take several years before regional components to the national public safety plan are fully implemented. Estimates place the product life of analog trunked technology at fifteen years. In the real world of public safety services analog trunked technology will be used for at least the next 15-20 years.

I also disagree with the majority that mandating a trunking standard would thwart the advancement of future radio systems and that it would take too long to develop a standard. First, where is it written that a trunking standard would have to be developed "from scratch"? Trunking protocols already exists. Furthermore, it is a spurious argument to say that standards thwart the development of new technology. If this were the case, then we would have to scrap many communication technology and transmission standards developed by industries and endorsed by the government.

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While failing to establish an analog trunking standard, the Commission does recognize the benefit of standards. In discussing the advisability of standards for the next generation of public safety services the Commission states:

...advanced communications systems could enable a higher form of interoperability than currently achievable, and could promote the competition among equipment manufacturers desired by many of the commenters while at the same time enabling the spectrum efficiencies that will be needed to handle increased communications requirements. We will, therefore, explore the issue of standards and other matters relating to the future radio communications technologies through the release of a further notice of inquiry. (See, para. 32.)

The only real hope is the fact that public safety services are running out of spectrum and if necessity is the mother of invention, then more spectrum efficient technology will have to be developed. Perhaps at that point the Commission will have the insight to develop with industry the requisite standards necessary to ensure spectrum efficiencies and interoperability.