



January 15, 2016

Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

To Whom It May Concern:

The Bay Area Regional Interoperable Communications Systems Authority (BayRICS) is a regional Joint Powers Authority representing seven Counties and the three big Cities in the San Francisco Bay Area. BayRICS has conducted significant work toward completion of a wireless broadband network for public safety using 700 MHz Public Safety Broadband and D Block Spectrum (Band Class 14).

We are aware that a consortium of several public and private entities, including the Northern California Regional Intelligence Center (NCRIC), are engaged in critical security and incident response preparations for the Super Bowl 50 at Levi's Stadium in Santa Clara, CA on February 7, 2016. These preparations cover highly-attended public activities over two weeks and in multiple locations throughout the San Francisco Bay Area. The entities have discussed using Long Term Evolution (LTE) equipment and Band Class 14 controlled by FirstNet to support these activities. The entities may seek Special Temporary Authority (STA) from the Commission to conduct temporary and limited operations on Band Class 14 within BayRICS' anticipated area of operation.

BayRICS strongly supports the efforts of NCRIC and others to utilize Band Class 14 spectrum. Security for the Super Bowl demands access to high-speed data services. However, we know that the existing commercial services available around Levi's Stadium are not designed for or capable of supporting mission critical security services.

We are confident that the issuance of an STA would benefit Bay Area public safety as they prepare for Super Bowl 50. Operation and use of the Band Class 14 spectrum will be limited to a specific time frame and geographic area as set forth in the STA application. With these limitations, and subject to any additional approvals required by FirstNet BayRICS strongly supports this use of Band Class 14 spectrum within the BayRICS geographic area for this limited purpose.

Please feel free to contact me if you have any questions.

Respectfully submitted,

_____/s/
Barry Fraser
General Manager
BayRICS Authority