



June 11, 2012

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TWA325
Washington, DC 20554

**Re: Application of Pinellas County, Florida, for Temporary Spectrum Use
St. Petersburg, FL, and Tampa, FL - July 1, 2012, to January 1, 2013**

Dear Ms. Dortch:

The Public Safety Spectrum Trust ("PSST") hereby provides its consent to the application of Pinellas County, Florida, for experimental special temporary authority ("Experimental STA") regarding its proposed temporary operation in the PSST's 700 MHz band spectrum to demonstrate Long Term Evolution ("LTE") equipment in St. Petersburg, Florida, and Tampa, Florida, between July 1, 2012 and January 1, 2013, as described in more detail below. The PSST understands that the temporary operation planned would conform to the following parameters:

- 1) Operation will be confined to the immediate vicinity of 150 14th Street North, St. Petersburg, FL 33701 and 411 North Franklin Street, Tampa, FL 33602. The equipment will include temporary base stations and associated antenna located at the named demonstration sites, along with less than 50 portable units all operating at no more than 4.8 kilometers from the base sites.
- 2) Pinellas County, Florida, has requested authority from the FCC to operate over the 763-768/793-798 MHz bands, which are currently licensed on a nationwide basis to the PSST as part of the 700 MHz Public Safety Broadband License.
- 3) Operation will occur between July 1, 2012 and January 1, 2013, allowing time during that period for setup and testing, demonstrations, and teardown. The demonstration network will also be used during the Republican National Convention, which is a National Special Significant Event (NSSE) that occurs between August 26 and August 30, 2012.
- 4) We understand that Pinellas County has analyzed information from the FCC's license databases and has determined that the proposed operation would not

interfere or create a significant potential for interference with any public safety operations in the 700 MHz band.

5) Pinellas County has stated that this temporary operation will not be used in mission-critical operations or in the delivery of live transmissions in duties to protect life, property, or safety. The equipment to be used will include a base station and associated antennae located at the demonstration site, and a small number of portable units in testing scenarios only.

6) Pinellas County has stated that the experimental special temporary authority will be used to create a pilot program for an interoperable LTE public safety wireless broadband network (PSWBN). This network, operated by Pinellas County and using LTE broadband technologies, networks, and devices, will provide first responders with devices that will allow them to test seamless communications and utilize broadband speeds, data, and applications.

Given the above information, the PSST concurs with the proposed operation by Pinellas County on certain frequencies currently licensed to the PSST as part of the 700 MHz Public Safety Broadband License for purposes of demonstrating LTE equipment in St. Petersburg, Florida and Tampa, Florida.

This consent is subject to the PSST's ongoing ability to monitor any operations and use of the PSST's licensed spectrum. In addition, the PSST notes that the Middle Class Tax Relief and Job Creation Act of 2012 ("Spectrum Act") [Public Law No. 112-96, 126 Stat. 156 (2012)] directs the FCC to reallocate the Upper 700 MHz D Block for public safety services and to assign a license for both the D Block and the spectrum comprising the 700 MHz Public Safety Broadband License (currently licensed to the PSST) to the First Responder Network Authority ("FirstNet"). The PSST's consent is valid only while the PSST remains the 700 MHz Public Safety Broadband Licensee and is subject to any action the FCC may take to comply with the requirements of the Spectrum Act.

Respectfully submitted,



Chief Harlin R. McEwen
Chairman
Public Safety Spectrum Trust Corporation
(607) 227-1664
chiefhrm@pubsaf.com