

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	<b>PS Docket No. 06-229</b>
	)	
Comments on The Public Safety Spectrum	)	
Trust's Proposed Budget and Administrative	)	
Fees for the 700 MHz Public Safety	)	
Broadband Waiver Recipients	)	

The Bay Area UASI, on behalf of the San Francisco Bay Area, respectfully submit comments in response to the Federal Communications Commission's June 18, 2010 request for comment on The Public Safety Spectrum Trust's Proposed Budget and Administrative Fees for the 700 MHz Public Safety Broadband Waiver Recipients.

Understanding that the Commission is seeking general comment on the budget and the Lease Administrative Fee proposed and more specifically to the reasonableness of the PSST's proposal, the Bay Area contends that while the first year expenses as identified are reasonable for the development of the Lease there is a need for additional funds to be included for the Administrative Maintenance of the agreements in the initial buy in as well as on-going.

As described in the FCC Waiver Order (FCC 10-79A1) the expectation of the PSST as the Administrator of the Lease Agreements will include responsibility in preparing and administering the actual agreement, but also to maintain du jour control over the spectrum. As with any significant project there is need for Stakeholder orientation and information sharing, the projects that will be supported by this Spectrum will be some of the largest projects in the careers of the petitioners and to only have access to the PSST for a few hours will hinder the communications efforts necessary for the projects to be a success. The Bay Area recommends that a minimum of 20 hours per Petitioner be allowed on an annual basis for direct support from the PSST Staff (420 hours) excluding the proposed book keeping and accounting support of 150 hours.

Further, the need for access to the PSST Staff during the development of, and on-going management of the Lease Agreements is paramount to the success of the intended

interoperability of the systems that will use the Spectrum. Therefore, the Bay Area also believes that it is reasonable to provide a fair budget for the Miscellaneous Expenses that will be incurred by the PSST Staff.

The Bay Area Respectfully submits the following budget for consideration:

	Estimate PSST Staff Hours (\$150 hour)	Estimate Attorney or Technical Hours (\$500 hour)	Estimate Bookkeeping Accounting Hours (\$100 hour)	Total Proposed Costs	Proposed Costs per Lessee
Lease Preparation & Finalization	112	174		\$103,800	\$3,990
Compliance Efforts	126	153		\$95,400	\$4,542
Budget & Reporting	420	74	150	\$115,000	\$5,476
Miscellaneous Expenses				\$84,000	\$4,000
First Year Expenses				\$398,200	\$19,000
Annual Expenses (on-going)				\$294,400	\$14,000

DATED: June 25, 2010

Respectfully submitted,

BAY AREA UASI

LAURA PHILLIPS

General Manager



BY: \_\_\_\_\_

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General Manager