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VIA ELECTRONIC FILING

Mr. Julius Genachowski
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: June 30, 2010 Letter from House of Representatives Committee on Energy and Commerce on Narrowband Public Safety Communications; WT Docket No. 06-150, PS Docket No. 06-229.

Dear Chairman Genachowski:

The Telecommunications Industry Association (TIA) respectfully submits input regarding questions posed to the Federal Communications Commission (Commission) by the Leadership of the U.S. House of Representatives Committee on Energy and Commerce regarding interoperability of both public safety narrowband and broadband communications.¹ Some TIA members produce public safety narrowband devices and are involved in Project 25, the initiative that continues to develop standards for narrowband interoperability.² TIA hopes to address several issues discussed in the June 30, 2010 House Committee on Energy and Commerce letter.³

¹ Letter from Congressman Henry A. Waxman, Chairman, U.S. House of Representatives Committee on Energy and Commerce, Congressman Joe Barton, Ranking Member, U.S. House of Representatives Committee on Energy and Commerce, Congressman Rick Boucher, Chairman, Subcommittee on Communications, Technology, and the Internet, and Congressman Cliff Stearns, Ranking Member, Subcommittee on Communications, Technology, to Julius Genachowski, Chairman, Federal Communications Commission (Jun. 30, 2010) (June 30, 2010 House Committee on Energy and Commerce letter) available at: <http://energycommerce.house.gov/documents/20100630/Genachowski.FCC.2010.6.30.pdf>.

² Project 25, with the assistance of Telecommunications Industry Association volunteers, has created a series of technical documents known as the TIA-102 standard. This voluntary, consensus-based standard describes and/or defines a number of the interfaces associated with a digital land mobile radio system. Law enforcement and other public safety entities may or may not utilize wireless communications systems and equipment which include the TIA-102 standard, in whole or in part. Additionally, in cases where public safety utilizes TIA-102 equipment, such equipment may also include features and functions that are not defined by the standard, but which features and functions the public safety agency feels are important for satisfying the agency's operational needs.

³ TIA appreciates the House Committee on Energy and Commerce on its attention to public safety's

As the Commission responds to the June 30, 2010 House Committee on Energy and Commerce letter, it is critical that key distinctions between voice interoperability and the Project 25 standard and broadband interoperability are noted. The current state of voice interoperability has little bearing on the success of public safety broadband interoperability.

The June 30, 2010 House Committee on Energy and Commerce letter asks if “interoperability requirements applied to the wireless public safety broadband network can be utilized to promote interoperability between the narrowband and broadband networks.”⁴ TIA believes that this is a reasonable goal and can be achieved if addressed at the network level. With the appropriate framework, there is no technical reason why a network of networks cannot be expanded to include narrowband networks. However, public safety must participate in the broadband standards development process to ensure that public safety requirements for features and functionality are included in future standard releases to promote interoperability.

The June 30, 2010 House Committee on Energy and Commerce letter contends that there is “an exclusive or limited vendor pool for [narrowband] equipment and devices,” and suggests this contributes to a lack of public safety narrowband communications interoperability.⁵ With regard to the lack of network interoperability in the narrowband space, this has been caused by factors largely other than the number of narrowband public safety device manufacturers.⁶

In discussing the competitive market for narrowband public safety devices, TIA urges the Commission to make clear that the Project 25 standard was established, in part, to allow for competition, particularly for terminal devices on Project 25 networks. Moreover, the website www.project25.org lists nearly 30 suppliers of Project 25 products and services. TIA requests that the Commission to note that Project 25, in and of itself, does not and has not developed any communications equipment. Any manufacturer desiring to satisfy market demands that the manufacturer has determined are present develops wireless communications equipment conforming to varying degrees with the requirements of the voluntary, consensus-based, TIA-102 standard.

ongoing efforts to achieve interoperability. As the Commission prepares its response, TIA urges the Commission to reference testimonies given at the Hearing on Interoperability in Public Safety Communications Equipment on May 27, 2010, before the Subcommittee on Technology and Innovation, Committee on Science and Technology.

⁴ June 30, 2010 House Committee on Energy and Commerce letter at 4.

⁵ *Id.* at 1-2.

⁶ See Testimony of Chief Jeffrey Johnson, May 27, Hearing on Interoperability in Public Safety Communications Equipment.

Contrary to the June 30, 2010 House Committee on Energy and Commerce letter's inference, the level of competition in the narrowband public safety device market may not increase or decrease product price.⁷ Public safety networks and equipment require unique attributes; stringent requirements both in performance and form factor do add to the manufacturing cost of narrowband public safety equipment. An example can be seen in radio terminal handsets for firefighters. Firefighter handsets require a large form factor and hardened device that can be operated while wearing large gloves in high heat environments. Further, public safety narrowband device requirements for durability and longevity of service are for long periods of time with actual service potentially reaching 10-15 years. These robust features and extreme operational demands impact product pricing.

Although suggested by the June 30, 2010 House Committee on Energy and Commerce letter, Project 25 never intended to establish or govern a public safety interoperable voice network.⁸ Thus, the June 30, 2010 House Committee on Energy and Commerce letter's suggestion that such a network exists and is governed by Project 25 fails to recognize that the purpose of Project 25 was simply to develop voluntary, consensus based, public safety digital land mobile radio standards that could be used by manufacturers as such manufacturers see fit.

TIA appreciates the Commission's ongoing efforts to achieve public safety communications interoperability. As it responds to the June 30, 2010 House Committee on Energy and Commerce letter, TIA urges that the issues detailed above are reflected. We look forward to continuing to work with the Commission on this important matter.

Sincerely,

_____/s/_____

Danielle Coffey
Vice President
Government Affairs

⁷ See June 30, 2010 House Committee on Energy and Commerce letter at 2.

⁸ See *id.* (referencing "the public safety interoperable voice network, governed by Project 25.").