

applications. For over eighty years, TIA has enhanced the business environment for broadband, mobile wireless, information technology, networks, cable, satellite, and unified communications. Members' products and services compete to empower communications in every industry and market, including healthcare, education, security, public safety, transportation, government, the military, the environment and entertainment. TIA is accredited by the American National Standards Institute (ANSI). A number of TIA representatives are manufacturers of equipment used in the 700 MHz public safety broadband network.

TIA shares Harris's concern that the Commission's language in the Texas Waiver Order dangerously approaches "inadvertently implies a statewide mandate to build a network with the same vendor-specific technologies include in a local core network."² TIA believes that the Commission's intent was not to authorize any type of procurement or deployment schemes when it made the statement that it "expect[s] that constituent jurisdictions will work with the [the State of Texas] to minimize duplicative expenses and facilities where appropriate, in order to limit the need for multiple system identifiers or other impediments to interoperability,"³ but rather to underscore the Commission's desire for individual jurisdictions to act as facilitators in "[cooperating] fully with its constituent jurisdictions to ensure that any deployments by constituent jurisdictions not only adhere to the Commission's requirements, but also conform to a statewide plan for deployment."⁴

² Harris Petition at 4.

³ Texas Waiver Order at ¶ 16.

⁴ Texas Waiver Order at ¶ 16.

TIA strongly believes that competition will drive improvements in the provision of public safety equipment, and that the most effective public safety broadband network will come to fruition as a result of market-based principles. For this fundamental reason, the Commission should take great care to ensure that it does not influence procurement practices, as even an implied endorsement could be misconstrued by various jurisdictions engaged in the public safety network buildout, affecting competition in the market; could lessen interoperability; and could increase buildout costs for jurisdictions. Furthermore, the Commission has already noted its dedication to technology neutrality in the network,⁵ which would be threatened by an endorsement of a particular procurement policy. The Commission is ardently encouraged to ensure that the network is interoperable by using an open standards- and market-based approach that will ensure that investment and development in the 700 MHz nationwide public safety broadband network is not inhibited by lack of competition.⁶

Pursuant to the Harris Petition, TIA supports PSHSB clarifying that the language in the Texas Waiver Order shall not be construed to require public safety entities to any particular procurement model. PSHSB is urged to make absolute that it does not endorse any procurement model in the process of building an interoperable wireless broadband public safety network, and to emphasize its focus on interoperability and its commitment to the deployment of such a network through a competitive and transparent process.

⁵ Service Rules for the 698-746, 747-762 and 777- 792 MHz Bands; Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band, Amendment of Part 90 of the Commission’s Rules, WT Docket No. 06-150, PS Docket No. 06-229, WP Docket No. 07-100, *Third Report and Order and Fourth FNPRM* (2011) at ¶ 10 (noting that “the Commission’s traditional posture of technological neutrality... has served the public interest well [and] has led to robust competition and innovation to the benefit of consumers.”).

⁶ See Comments of TIA, WT Docket No. 06-150, PS Docket No. 06-229, WP Docket No. 07-100 (filed Apr. 11, 2011) at 8-9.

For the foregoing reasons, TIA submits this comment in support of the Harris Petition.

Respectfully submitted,

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