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VIA ELECTRONIC DELIVERY

Corey Reynolds
Public Safety Communications Research (PSCR) Support
Corner Alliance, Inc.
Email: creynolds@corneralliance.com

Re: Comments on the Example NIST-DHS P25 Conformance Tests for the
P25 Compliance Assessment Program

Dear Mr. Reynolds:

The Telecommunications Industry Association (TIA) submits these comments in response to the May 24 communication soliciting comment on the National Institute of Standards and Technology (NIST) and Department of Homeland Security (DHS)-developed Project 25 (P25) example Conformance Tests for the P25 Compliance Assessment Program (CAP).

TIA believes NIST-DHS should ensure that any P25 CAP testing procedures be directly traceable to the published standards for the features and functions outlined in the TIA-102 series of documents. NIST-DHS must be careful that no tests associated with the P25 CAP test for features and functions not defined in the TIA-102 series of documents. TIA will continue to produce Recommended Compliance Assessment Tests (RCATs) in which TIA will recommend product development tests – be they interoperability, conformance, or performance – it believes are appropriate for the compliance assessment environment, and encourages NIST-DHS to seriously consider those recommendations.

NIST-DHS must also take steps to facilitate the involvement of test equipment manufacturers who can develop or apply the test equipment necessary to assure appropriate repeatability of results across manufacturers and laboratories.

The TIA-102 process has enhanced competitiveness in the public safety narrowband market by promoting openness and innovation. NIST-DHS should be cautious of disturbing this effect on the market which has brought about substantial reductions in equipment prices over the last decade. TIA looks forward to continuing work with all stakeholders towards ensuring the most efficient and interoperable public safety communications network possible.

Respectfully submitted,

/s/ Danielle Coffey

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