Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of	)
	)
Comment Sought on NPSTC Broadband Task	)
Force and Public Safety Spectrum Trust	)
Technical Recommendations for 700 MHz	)
Public Safety Broadband Deployments	)
	)
Service Rules for the 698-746, 747-762 and	) WT Docket No. 06-150
777-792 MHz Bands	)
	)
Implementing a Nationwide, Broadband,	) PS Docket No. 06-229
Interoperable Public Safety Network in the 700	)
MHz Band	)

COMMENTS OF THE TELECOMMUNICATIONS INDUSTRY ASSOCIATION

INTRODUCTION.

The Telecommunications Industry Association (TIA) hereby submits comments to the

Federal Communications Commission (Commission) in the above-captioned

proceeding.[1] TIA appreciates the opportunity to discuss recommended technical

requirements that may allow local and regional public safety entities to build out

interoperable broadband public safety networks. TIA urges the Commission to develop

policies that will ensure that regional networks seamlessly interoperate with a nationwide

interoperable public safety wireless broadband communications network that delivers

core requirements to first responders.

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[1] *See* Comment Sought on NPSTC Broadband Task Force and Public Safety Spectrum Trust Technical
Recommendations for 700 MHz Public Safety Broadband Deployments, WT Docket. No. 06-150, PS
Docket No. 06-229, Public Notice, DA 10-458 (rel. Mar. 17, 2010) (Public Notice on NPSTC/PSST
Recommendations).

The Telecommunications Industry Association (TIA) represents the global information and communications technology (ICT) industry through standards development, advocacy, tradeshows, business opportunities, market intelligence and world-wide environmental regulatory analysis. Its 500 member companies manufacture or supply the products and services used in the provision of broadband and broadband-enabled applications. Since 1924, TIA has enhanced the business environment for broadband, mobile wireless, information technology, networks, cable, satellite and unified communications. Members' products and services empower communications in every industry and market, including healthcare, education, security, public safety, transportation, government, the military, the environment and entertainment.

SUMMARY.

As the National Broadband Plan makes clear, the United States simply has not seized the opportunity to protect the lives of first responders and all Americans through the deployment of a nationwide interoperable public safety wireless broadband communications network.[2] Such a network is an essential element to our nation's safety, and the Commission should take immediate steps to deploy a carefully-crafted network that is economically and technically viable. With respect to the Public Safety Spectrum Trust's (PSST) and National Public Safety Telecommunications Council (NPSTC) Broadband Task Force's (BBTF) recommendations on requirements for any local entity

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[2] FEDERAL COMMUNICATIONS COMMISSION OMNIBUS BROADBAND INITIATIVE, CONNECTING AMERICA: THE NATIONAL BROADBAND PLAN (2010) (National Broadband Plan) at 313 ("Unfortunately, the United States has not yet realized the potential of broadband to enhance public safety. Today, first responders from different jurisdictions and agencies often cannot communicate during emergencies.").

seeking to build out an interoperable broadband public safety network,[3] TIA urges the Commission to endorse technology-neutral interoperability requirements, for example based on the BBTF Report, as a set of voluntary best practices to guide early adopters' deployment of 700 MHz public safety broadband networks. However, these interoperability requirements must be augmented or altered by any waiver grantee to comply with the technology-neutral interoperability requirements the Emergency Response Interoperability Center (ERIC) determines necessary for the deployment of a nationwide public safety broadband network.[4] Additionally, as ERIC considers roaming requirements, TIA suggests that the BBTF Report's multiple roaming definitions be evaluated in the context of technical feasibility. TIA urges the Commission to ensure that both the public safety community and industry have a major voice in the determinations ERIC makes.

DISCUSSION.

I.   WAIVER RECIPIENTS SHOULD BE ENCOURAGED TO VOLUNTARILY USE THE NPSTC BBTF RECOMMENDATIONS AS A FRAMEWORK FOR INTIAL DEPLOYMENTS, WHILE ULTIMATELY MANDATED TO ADHERE TO ALL RULES DEVELOPED BY ERIC FOR THE NATIONWIDE NETWORK.

The Commission's Public Safety and Homeland Security Bureau (PSHSB) requests comment on the PSST/NPSTC Waiver Request Recommendations, which seek to establish minimum requirements to allow those localities and regions who have sought

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[3] *See* Letter from Harlin McEwen to Chairman Julius Genachowski, PS Docket No. 06-229, WT Docket No. 06-150 (Dec. 15, 2009) (PSST/NPSTC Waiver Request Recommendations). *See also* David Buchanan et al., Nat'l Pub. Safety and Telecomms. Council, 700 MHz Public Safety Broadband Task Force Report and Recommendations (Sept. 4, 2009), available at http://www.npstc.org/documents/700_MHz_BBTF_Final_Report_0090904_v1_1.pdf (last visited Mar. 31, 2009) (BBTF Report).

[4] TIA urges the Commission to ensure that ERIC is comprised of a host of experts, including those from the ICT industry, and that any requirements do not favor or disfavor a particular technology.

waivers[5] to build out local interoperable public safety broadband networks.[6] Particularly,

the PSHSB seeks evaluation of the elements of the BBTF Report that address technical

needs of a local interoperable public safety network.[7]

As the National Broadband Plan states, building an effective and viable public safety

broadband network requires careful planning.[8] In this planning, ERIC, as the entity that

will ensure that public safety broadband applications, devices, and networks work

seamlessly, must be certain that all interoperability requirements it sets are the most

effective and neutral from a technical and viability standpoint. This effort will take time

and evaluation of field experiences that can inform ERIC as to the best path to take. As

PSST made clear, the local and regional systems that could be deployed upon the

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[5] *See* City of Boston Request for Waiver, PS Docket No. 06-229 (filed Dec. 11, 2008) (Boston Petition);
City of Boston Amended Request for Waiver, PS Docket No. 06-229 (filed May 28, 2009) (Boston
Amended Petition); City and County of San Francisco, City of Oakland, City of San Jose Request for
Waiver, PS Docket No. 06-229 (filed Mar. 24, 2009) (Bay Area Petition); City and County of San
Francisco, City of Oakland, City of San Jose Request for Waiver, PS Docket No. 06-229 (filed May 28,
2009) (Bay Area Amended Petition); State of New Jersey Petition, PS Docket No. 06-229 (filed Apr. 3,
2009) (New Jersey Petition); City of New York Petition for Waiver, PS Docket No. 06-229 (filed June 8,
2009) (New York City Petition); District of Columbia Request for Waiver, PS Docket No. 06-229 (filed
June 26, 2009) (DC Petition); New York State Request for Waiver, PS Docket No. 06-229 (filed June 30,
2009) (NYS Petition); City of Chesapeake, Virginia, Request for Waiver, PS Docket No. 06-229 (filed July
8, 2009) (Chesapeake Petition); City of San Antonio, Texas, Petition for Expedited Waiver, PS Docket No.
06-229 (filed July 10, 2009) (San Antonio Petition); State of New Mexico, Petition for Expedited Waiver,
PS Docket No. 06-229 (filed July 10, 2009) (New Mexico Petition); North Dakota Petition, note 1, *supra*;
Petition for Waiver of the City of Charlotte, North Carolina, PS Docket No. 06-229 (filed Aug 4., 2009)
(Charlotte Petition); Petition for Expedited Waiver, PS Docket No. 06-229 (filed Aug. 7, 2009) (Iowa
Petition)(including the Counties of Blackhawk, Buchanan, Dubuque, Grundy, Johnson, Marshall, and Scott
and the City of Cedar Rapids).

[6] *See* Public Notice on NPSTC/PSST Recommendations.

[7] *See* id.

[8] National Broadband Plan at 313 ("Careful planning and strong commitment could create a cutting-edge
public safety communications system to allow first responders anywhere in the nation to communicate with
each other, sending and receiving critical voice, video and data to save lives, reduce injuries and prevent
acts of crime and terror.").

granting of waivers "present an opportunity to gain information, practical experience, and infrastructure that can be leveraged for the nationwide network."[9]

Thus, the Commission should grant the waivers encouraging the use of the NPSTC BBTF minimum interoperability requirements on a voluntary basis. By doing so, interoperable broadband public safety networks that will serve communities across the country can be deployed with sound, initial interoperability requirements. Further, the performance of these networks, along with that of the network being tested by the Public Safety Communications Research Program's 700 MHz Demonstration Network initiative, will provide valuable data for ERIC to establish permanent interoperability requirements for a nationwide public safety broadband network. As this data is collected and ERIC learns more about the most effective interoperability methodologies, ERIC may find that the interoperability requirements needed for a nationwide network differ from those in the BBTF Report and PSST recommendations.

Once ERIC, working with public safety entities and equipment vendors, establish nationwide requirements for the nationwide public safety broadband network, it is vital that uniform compliance is achieved. In order to best ensure interoperability, no single public safety entity should maintain interoperability methodologies inconsistent with ERIC's requirements. Thus, as a condition of granting a waiver request, local and regional public safety grantees should be required to implement any changes to their network necessary to abide by the requirements established for the nationwide public safety broadband network. Such a requirement should have a deadline that will ensure

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[9] PSST/NPSTC Waiver Request Recommendations at 1.

that any changes to the local and regional networks are made well before the nationwide network is deployed.

II. 700 MHz Public Safety Broadband Inter-Network Roaming Must Be Further Evaluated Before Any Roaming Recommendations Are Mandated.

As ERIC evaluates establishing interoperability requirements beyond those of the BBTF Report, TIA urges the Commission to fully assess the technical and operational capacity for 700 MHz public safety broadband networks to accommodate internetwork roaming. The BBTF Report identifies two types of roaming consisting of four roaming categories. The first type of roaming, intra-network roaming, contains one category, which is defined by the BBTF Report as: category one roaming between 700 MHz public safety networks. The second type of roaming, inter-network roaming, is divided into three categories by the BBTF Report including: category 2 roaming between private 700 MHz public safety and the D Block Shared Network; category 3 roaming between 700 MHz public safety networks to commercial 700 MHz networks; and category 4 roaming between 700 MHz public safety networks to commercial and private broadband networks in other bands.[10]

The BBTF Report notes that its "initial scope… will be to define the minimum set of interfaces required to support intra-network (category 1) roaming."[11] TIA believes that implementing any requirements beyond those that would ensure intra-network public safety roaming as a condition of waivers would be premature at this time. There are currently a number of technical and operational complexities surrounding inter-network (categories 2, 3 and 4) roaming that requires further examination by the Commission and

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[10] *See* BBTF Report at 50.

[11] *Id.* at 51. The BBTF Report continues: "The work for this (similar/common interfaces) can then be applied to the remaining roaming categories." Id.

public safety community at this time. It is unclear, given the Commission's roaming

recommendations made as part of the National Broadband Plan, which category of inter-

network roaming will be most appropriately applied under the network framework and

rules adopted for the PSBN and 700 MHz commercial.[12]

Therefore, it is important for the Commission to work with the public safety community

to fully evaluate the best way to implement inter-network roaming, particularly whether

inter-network roaming is technically feasible and operationally viable. As ERIC moves

forward, TIA urges the Commission to consider the capabilities of device manufacturers

and network operators in the context of roaming capacity.

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[12] In fact, TIA notes that inter-network roaming category number 2 may no longer be an applicable roaming category as a result of the recommendations made by the Commission in the National Broadband Plan for structuring the public safety broadband network and conducting a commercial auction of the D-Block.

CONCLUSION.

For the foregoing reasons, TIA encourages the Commission to take action in this

proceeding consistent with the recommendations set out above.

                        Respectfully submitted,

                        TELECOMMUNICATIONS INDUSTRY
                        ASSOCIATION

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