

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

In the Matter of	)	
	)	
Proposed Amendments to the Service Rules Governing Public Safety Narrowband Operations in the 769-775/799-805 MHz Bands	)	PS Docket No. 13-87
	)	
National Public Safety Telecommunications Council Petition for Rulemaking on Aircraft Voice Operations at 700 MHz	)	RM-11433
	)	
National Public Safety Telecommunications Council Petition for Rulemaking to Revise 700 MHz Narrowband Channel Plan	)	RM-11433
	)	
Region 24 700 MHz Regional Planning Committee Petition for Rulemaking	)	WT Docket No. 96-86
	)	PS Docket No. 06-229
	)	
State of Louisiana Petition for Rulemaking	)	RM-11577

To: The Commission

**COMMENTS OF THE TELECOMMUNICATIONS**

**INDUSTRY ASSOCIATION**

The Telecommunications Industry Association (TIA),<sup>1</sup> supported by approximately 500 participating members, is a trade association representing the ICT manufacturer, vendor, and supplier interest, responds to the Commission's *Further Notice of Proposed Rulemaking* (NPRM) in the above-referenced

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<sup>1</sup> TIA is the leading trade association for the information and communications technology ("ICT") industry, representing companies that manufacture or supply the products and services used in global communications across all technology platforms, as well as an American National Standards Institute-accredited standard development organization for the telecommunications industry. TIA represents its members on the full range of policy issues affecting the ICT industry and forges consensus on industry standards. Among their numerous lines of business, TIA member companies design, produce, and deploy a wide variety of devices with the goal of making technology accessible to all Americans.

proceeding.<sup>2</sup> TIA appreciates this opportunity to share its insight with the Commission from the perspective of the equipment manufacturer and standard developer. Telecommunications Industry Association appreciates the Commission's careful consideration extended to our earlier petition for reconsideration expressing concern that requiring CAP compliance before equipment certification would be impractical because radios submitted for equipment certification often lack some of the features essential for public safety interoperability, including features necessary for the radios to receive CAP certification.<sup>3</sup> As we have consistently indicated, the association strongly concurs with the Commission's prior policy determination that "voluntary CAP compliance to give licensees information regarding the basis for vendor assertions that equipment is interoperable and complies with Project 25 standards and is interoperable across vendors."<sup>4</sup> We concur with the decision modifying rules in order to allow CAP compliance or the equivalent to be completed after equipment certification but prior to the marketing or sale of that equipment and believe that this advances the Commission's goals.

## **I. TIA SUPPORTS PUBLIC SAFETY DEVICE INTEROPRABILITY AND THE PROJECT 25 COMPLIANCE ASSESSMENT PROGRAM**

TIA and its members strongly support the Project 25 Compliance Assessment Program (P25 CAP). 2016 marked the 27th anniversary of the creation of Project 25 (P25), a critical suite of standards that have created the foundation for interoperable, digital, two-way wireless communications for public safety and emergency responders since 1989. Creating a single land mobile radio (LMR) standard serving the diverse needs of the

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<sup>2</sup> See, ORDER ON RECONSIDERATION AND FURTHER NOTICE OF PROPOSED RULEMAKING, "Comment Sought on the 700 MHz recommended Project 25 (P25) Compliance Acceptance Program (CAP) feature sets and capabilities" (Rel. August 22, 2016) ("Further Notice" or "PN")

<sup>3</sup> See Petition for Reconsideration by the Telecommunications Industry Association, Jan. 2, 2015 at 3 (TIA Petition). See also Notice of *Ex Parte* filed by Telecommunications Industry Association Dec. 9, 2014 (*Ex Parte*); TIA June 4, 2015 *Ex Parte* Response to NPSTC *Ex Parte* Dated May 28, 2015 and Filed May 29, 2015.

<sup>4</sup> Ibid

nation's first responders, federal government, and military users with interoperable equipment from a variety of different manufacturers represented a tremendous engineering challenge. In addition, the P25 standard had to offer efficient, reliable, public safety grade performance in urban, suburban, rural, and wild land environments and be backward compatible to existing technology in use. The standard also needed to offer efficient wide-area coverage with a minimum of tower sites as well as a direct mode for unit-to-unit operation outside of the infrastructure coverage. All of these technical requirements were to be met using half the bandwidth of existing analog systems, but delivering comparable audio quality and significantly improved encryption.

Because of these standards, radios from different jurisdictions and suppliers can talk to one another using a P25 standard common (over the) air interface (CAI) as well as a variety of standardized system interfaces. The communications interoperability provided by P25 improves public safety for all citizens by allowing coordinated multi-agency response and mutual aid during natural disasters, terrorist incidents, civil unrest, and mass public gatherings. The Project 25 suite of standards is also referred to as the TIA-102 series of standards for land mobile radio communications. Once a TIA-102 series document is approved for publication by TIA, the Project 25 Steering Committee determines whether to adopt the document as part of the Project 25 suite of standards.”

Interoperability for emergency responders has come a long way since 1989, and the P25 standards have evolved to meet changing needs and technical requirements for emergency communications. The Compliance Assessment Program makes a significant contribution to public safety communications by furnishing users with an independent assessment of P-25 compliance.

In the Department of Homeland Security Appropriations Act, 2007 (P.L. 109-295) Congress provided for coordination of emergency communication grants.<sup>5</sup> This led to the creation of the Compliance Assessment Program (CAP). CAP is a partnership of the Department of Homeland Security's Command, Control and Interoperability Division, the National Institute of Standards and Technology, industry, and the emergency response community, managed by the Science and Technology Directorate, the Command, Control and

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<sup>5</sup> See, P.L. 109-295, Title VI, Sec. 671(b), “Title XVIII, “Sec. 1804; 120 STAT. 1438.

Interoperability (CCI) Division. Its program description states: “P25 CAP is a formal, independent process for ensuring communications equipment declared by the supplier actually is P25 compliant and tested against the standards with publicly published results. Through this open standards testing process, P25 CAP provides responders confidence the communications equipment they use will be interoperable, regardless of manufacturer.”<sup>6</sup> TIA strongly supports the Department of Homeland Security’s (DHS) Project 25 Compliance Assessment Advisory Council (P25 CAP AP)<sup>7</sup> and recognizes the progress being made by this entity.

## II. TIA RECOMMENDATIONS REGARDING COMMENTS ON APPENDIX C

TIA provides the following discussion and recommendations on the Appendix C list. TIA agrees that a minimum set of features for interoperability should be specified and that this interoperability should be demonstrable via P25 CAP testing (or equivalent manufacturer proof of interoperability). However, the list of features in Appendix C contains inaccuracies and includes features not covered by P25 CAP.

TIA respectfully submits the following observations and recommendations on the points made in Appendix C, item 3.

*(d) Mobile and portable transceivers must at a minimum include the following feature sets and capabilities while operating in the conventional mode in order to be validated for compliance with the Project 25 standards.*

**Discussion:** This paragraph states the 15 functional items apply to “mobile and portable transceivers”. Functional items 1 – 5 and 7 – 10 specifically identify “a subscriber” while functional items 11 – 15 specifically identify “a fixed conventional repeater” and functional item 6 does not specify either.

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<sup>6</sup> See, DHS Science and Technology Directorate Project 25 Compliance Assessment Program [https://www.dhs.gov/sites/default/files/publications/P25CAP\\_Updated-One-Pager\\_20160624-508\\_0.pdf](https://www.dhs.gov/sites/default/files/publications/P25CAP_Updated-One-Pager_20160624-508_0.pdf) Charter for the Project 25 Compliance Assessment Program, April 2008, [http://www.pscr.gov/outreach/safecom/p25\\_cap/charter/Project25ComplianceAssessmentProgramCharter.pdf](http://www.pscr.gov/outreach/safecom/p25_cap/charter/Project25ComplianceAssessmentProgramCharter.pdf) p.3 (accessed October 24, 2016)

<sup>7</sup> The P25 CAP Advisory Panel will provide the “Office for Interoperability and Compatibility (OIC) with federal, state, local, tribal, and territorial perspectives on P25 portable, handheld, and vehicle-mounted radios and infrastructure equipment as used by public safety agencies.” Comments of the Project 25 Compliance Assessment Program Advisory Panel at 3 (Jan. 30, 2016).

We believe these 15 functional items, provided by the Compliance Assessment Program Advisory Panel, were intended to be relevant specifically to equipment intended to operate on the 700 MHz Conventional Interoperability Channels listed in § 90.531(b)(1). This item and the 15 sub items apply to 90.548 which is not specific to the 700 MHz Conventional Interoperability Channels listed in § 90.531(b)(1).

1. Recommendation: Replace (d) with the following:

*(d) Transceivers capable of conventional operations on the narrowband interoperability channels listed in §90.531(b)(1) must at a minimum include the following feature sets and capabilities while operating in the conventional mode in order to be validated for compliance with the Project 25 standards.*

*(1) A subscriber unit must be capable of issuing an emergency alarm in a conventional system conforming to the following standard: TIA 102.BAAD-A Conventional Procedures, Section 4.2.2., released February 2010.*

**Discussion:** The referenced version of the standard has been replaced with TIA-102.BAAD-B August 2015. This functionality is described in P25 Standard BAAD-B section 8.1 in the context of the Conventional FNE configuration type only. The August 2016 CAI CAB includes a test for this functionality in the FNE conventional configuration type only and not in the direct or repeat configuration types.

2. Recommendation: Replace (1) with the following:

*(1) A subscriber unit must be capable of issuing an emergency alarm in a conventional network configuration as described in TIA-102.BAAD-B Conventional Procedures section 8.1, with verification per the August 2016 CAI CAB which references TIA-102.CABA Conventional Interoperability Tests section 2.7.1.4.1.*

*(2) A subscriber unit must be capable of setting the emergency bit on all voice transmissions to notify units operating on the same channel that the user has declared an emergency situation conforming to the following standard: Project 25 Statement of Requirements, Section 2.1.2.25.1., released December 11, 2013.*

**Discussion:** The P25 SoR is not part of the standard, does not include enough information to enable independent implementations to interoperate, and has no published method of validation or verification. This functionality is described in P25 Standard BAAD-B section 6.2.1 for SU to Group only and is independent of Conventional configuration type. The August 2016 CAI CAB does include multiple tests for this functionality for SU to Group only in all 3 Conventional configuration types.

3. Recommendation: Replace (2) with the following:

*(2) A subscriber unit must be capable of setting the emergency bit on all voice transmissions to notify units operating on the same channel that the user has declared an emergency situation as described in TIA-102.BAAD-B Conventional Procedures section 6.2.1, with verification per the August 2016 CAI CAB which references TIA-102.CABA Conventional Interoperability Tests 2.2.4.4.1 (Direct) and 2.4.8.4.1 (Repeated) and 2.6.3.4.1 (to Console) and 2.6.3.4.2 (from Console).*

*(3) A subscriber unit must conform to the unit and accessory mil-spec requirements in accordance with the following standard: Project 25 Statement of Requirements, Sections 1.3.3 through 1.3.3.5., released December 11, 2013.*

**Discussion:** The P25 SoR is not part of the standard, does not include enough information to enable independent implementations to interoperate, and has no published method of validation or verification. This capability is not covered by the P25 standard and seems to be an equipment expectation independent of equipment interoperability. This capability is not covered by an August 2016 CAB.

4. Recommendation: Delete (3) since adherence, or not, to mil-spec requirements in P25 products does not affect interoperability.

*(4) A subscriber unit must be capable of issuing group calls in a conventional system in conformance with the following standard: Project 25 Statement of Requirements, Section 2.1.2.1., released December 11, 2013.*

**Discussion:** The P25 SoR is not part of the standard, does not include enough information to enable independent implementations to interoperate, and has no published method of validation or verification. This functionality is described in P25 Standard BAAD-B section 6.1 and is independent of Conventional configuration type. The August 2016 CAI CAB does include multiple tests for this functionality in all 3 Conventional configuration types.

5. Recommendation: Replace (4) with the following:

*(4) A subscriber unit must be capable of issuing group calls as described in TIA-102.BAAD-B Conventional Procedures section 6.1, with verification per the August 2016 CAI CAB which references TIA-102.CABA Conventional Interoperability Tests 2.2.2.4.1 (Direct), 2.4.2.4.1 (Repeated), 2.6.2.4.1 (to/from a Console).*

*(5) A subscriber unit must be capable of issuing private calls in a conventional system in conformance with the following standard: Project 25 Statement of Requirements, Section 2.1.2.3., released December 11, 2013.*

**Discussion:** The P25 SoR is not part of the standard, does not include enough information to enable independent implementations to interoperate, and has no published method of validation or verification. This functionality is described in P25 Standard BAAD-B section 6.4 and is independent of Conventional configuration type. The August 2016 CAI CAB does include a test for this functionality in all 3 Conventional configuration types.

6. Recommendation: Replace (5) with the following:

*(5) A subscriber unit must be capable of issuing private calls as described in TIA-102.BAAD-B Conventional Procedures section 6.4, with verification per the August 2016 CAI CAB which references TIA-102.CABA Conventional Interoperability Tests 2.2.5.4.1 & 2.2.5.4.2 (Direct), 2.4.10.4.1 & 2.4.10.4.2 (Repeated), 2.6.5.4.1 (From Console) & 2.6.5.4.2 (To Console).*

*(6) The three Project 25 standard squelch modes must be supported in conformance with the following standard: Project 25 Statement of Requirements, Section 2.1.2.30, as effective on December 11, 2013.*

**Discussion:** The P25 SoR is not part of the standard, does not include enough information to enable independent implementations to interoperate, and has no published method of validation or verification. The 3 squelch modes, as they apply to the SU receiver, are described in P25 Standard BAAD-B section 6.1.1.3. The August 2016 CAI CAB does include a test for this SU receiver functionality in the Direct and Repeat Conventional configuration types but not in the FNE Conventional configuration type.

7. Recommendation: Replace (6) with the following:

*(6) Subscriber units must be capable of supporting the 3 squelch modes (monitor, normal, selective) as described in TIA-102.BAAD-B Conventional Procedures section 6.1.1.3, with verification per the August 2016 CAI CAB which references TIA-102.CABA Conventional Interoperability Tests 2.2.3.4.1 (Direct, monitor squelch), 2.2.1.4.1 (Direct, normal squelch), 2.2.2.4.1 (Direct, selective squelch), 2.4.9.4.1 (Repeated, monitor squelch), 2.4.1.4.1 (Repeated, normal squelch), 2.4.6.4.1 (Repeated, selective squelch).*

*(7) A subscriber unit must properly implement the special "Reserved" conventional network access code (NAC) and talkgroup in conformance with the following standard: TIA TSB-102.CABA, released October 2010.*

**Discussion:** The referenced document is a P25 Standard Test document. P25 does not define a "Reserved" NAC. The value of the default NAC is found in P25 Standard BAAC-C (April 2011) section 2.1 and is independent of the Conventional configuration type. P25 does not define a "Reserved" talkgroup. The value of the default talkgroup is found in P25 Standard BAAC-C (April 2011) section 2.5 and is independent of the Conventional configuration type. The August 2016 CAI CAB does include tests that use the default NAC and default talkgroup values in all 3 Conventional configuration types.

8. **Recommendation:** Delete (7) because both the default NAC value and the default talkgroup value are used in the tests referenced by (6).

*(8) A subscriber unit must include "No Call" Talk Group (\$0000) and "All Call" Talk Group (\$FFFF) in conformance with the following standard: Project 25 Statement of Requirements, Section 2.1.2.34., released December 11, 2013.*

**Discussion:** The P25 SoR is not part of the standard, does not include enough information to enable independent implementations to interoperate, and has no published method of validation or verification. The operation of the "No Call" and "All Call" talkgroup values are defined in P25 Standard BAAC-C (April 2011) section 2.5 and are independent of Conventional configuration type. P25 Standard BAAD-B section 6.3 describes the procedures for the "All Call" feature in section 6.3 for the Conventional FNE configuration type only. There are no P25 Standard interoperability tests for the "No Call" talkgroup value in any Conventional configuration type and the P25 Standard test for the "All Call" talkgroup value is only defined for the Conventional FNE configuration type.

The August 2016 CAI CAB does not include a test for the "No Call" talkgroup value in any Conventional configuration type and the test for the "All Call" talkgroup value is only defined for the Conventional FNE configuration type.

9. **Recommendation:** Replace (8) with the following:

*(8) Subscriber units must be capable of supporting the "All Call" talkgroup (\$FFFF) in a conventional network configuration as described in TIA-102.BAAD-B Conventional Procedures section 6.3, with verification per the August 2016 CAI CAB which references TIA-102.CABA Conventional Interoperability Tests 2.6.4.4.1.*

*(9) A subscriber unit must be able to transmit and receive the appropriate status symbols to indicate that a channel is busy in both direct and repeater mode in conformance with the following standard: TIA TSB-102.CABA, released October 2010.*

**Discussion:** The referenced document is a P25 Standard Test document. Status symbol setting for a Conventional station/subscriber is described in P25 Standard BAAD-B section 2.6. Note that an SU always sets the status symbol to one of 2 values representing an "unknown" receive channel status. Note also that the ability of an SU to receive a status symbol does not address subscriber behavior based on the status symbol received and in some cases subscriber units are allowed to ignore status symbols. There are no P25 Standard interoperability tests for setting, receiving or acting upon status symbols in any Conventional configuration type. The August 2016 CAI CAB does not include a test for setting, receiving or acting upon status symbols in any Conventional configuration type.

10. **Recommendation:** Delete (9) since there are no P25 tests or August 2016 CAI CAB tests specifically defined for status symbols, and the other specified CAP tests indirectly verify correct status symbol operation.

*(10) A subscriber units must be compatible with C4FM and CQPSK Modulation in conformance with the following standard: TIA TSB-102.CABA, released December 11, 2013.*

**Discussion:** The referenced document is a P25 Standard Test document and does not discuss either modulation type and existing FCC regulations do not define “compatible with”. Both modulation types are described in P25 Standard BAAA-A (Sept 2003) section 9. CQPSK Modulation is typically used only for Simulcast transmitters and not used by subscriber unit transmitters. Simulcast transmitters are typically only used in the Conventional FNE configuration type. C4FM transmitters are used independent of Conventional Configuration type. According to the referenced standard, a QPSK demodulator is capable of demodulating either C4FM or CQPSK modulation types. The P25 C4FM/CQPSK Measurement Methods standard CAAA-E (March 2016) section 1.4.3.6 describes 2 types of CQPSK test signals that may be used for testing receiver performance and states the test modulation used shall be the manufacturer’s choice. There are no P25 Standard tests that specifically determine that a subscriber is compatible with C4FM and/or CQPSK modulation although CAAB-D identifies performance recommendations for C4FM and standard simulcast for Reference Sensitivity (CAAA-E 2.1.4), Faded Reference Sensitivity (CAAA-E 2.1.5), Signal Delay Spread Capability (CAAA-E 2.1.6) and Adjacent Channel Rejection (CAAA-E 2.1.7). The August 2016 CAI CAB does not include tests that specifically determine that a subscriber is compatible with C4FM and/or CQPSK modulation although it does call for SU performance testing using CAAA-E tests 2.1.4, 2.1.5, 2.1.6 and 2.1.7 with both a C4FM test modulation signal and a standard simulcast modulation signal without specifying which standard simulcast modulation signal is to be used.

11. **Recommendation:** Delete (10) since there are no P25 tests or August 2016 CAI CAB tests specifically defined for verifying modulation compatibility, and existing P25 CAP performance tests verify modulation and demodulation performance.

*(11) A fixed conventional repeater must be able to repeat the correct/matching network access code (NAC) for all subscriber call types (clear and encrypted) using the same output NAC in conformance with the following standard: TIA TSB-102.CABA, released December 11, 2013.*

**Discussion:** The referenced document is a P25 Standard Test document. This functionality is described in P25 Standard BAAD-B section 2.5 and applies to the Conventional Repeat configuration only (i.e. mobile relay). The August 2016 CAI CAB includes testing for this functionality in the Conventional Repeat configuration only. Note: Mobile relay is FCC terminology for what the LMR industry calls a ‘repeater’.

12. **Recommendation:** Replace (11) with the following:

*(11) Conventional repeaters (i.e. mobile relays) must be able to be configured to repeat the correct/matching network access code (NAC) for all subscriber call types (clear and encrypted) using the same output NAC as described in TIA-102.BAAD-B Conventional Procedures section 2.5, with verification per the August 2016 CAI CAB which references TIA-102.CABA Conventional Interoperability Tests 2.4.1.4.1 (unaddressed voice call) and 2.4.2.4.1 (group call), 2.4.10.4.1 & 2.4.10.4.2 (Unit to Unit calls).*

*(12) A fixed conventional repeater must be able to repeat the correct/matching network access code (NAC) for all subscriber call types (clear and encrypted) using a different output NAC in conformance with the following standard: TIA TSB-102.CABA, released December 11, 2013.*

**Discussion:** The referenced document is a P25 Standard Test document. This functionality is described in P25 Standard BAAD-B section 2.5 and applies to the Conventional Repeat configuration only regardless of call type. The August 2016 CAI CAB includes testing for this functionality in the Conventional Repeat configuration type for group calls only.

13. Recommendation: Replace (12) with the following:

*(12) Conventional repeaters (i.e. mobile relays) must be able to be configured to repeat the correct/matching network access code (NAC) for all subscriber call types (clear and encrypted) using a different output NAC as described in TIA-102.BAAD-B Conventional Procedures section 2.5, with verification per the August 2016 CAI CAB which references TIA-102.CABA Conventional Interoperability Tests 2.4.3.4.1 (unaddressed voice call), 2.4.4.4.1 (group call) for group calls only.*

*(13) A fixed conventional repeater must be able to reject (no repeat) all input transmissions with incorrect network access code (NAC) in conformance with the following standard; TIA TSB-102.CABA, released December 11, 2013.*

**Discussion:** The referenced document is a P25 Standard Test document. This functionality is described in P25 Standard BAAD-B section 2.5 and applies to the Conventional Repeat configuration only regardless of call type. The August 2016 CAI CAB includes testing for this functionality in the Conventional Repeat configuration type only.

14. Recommendation: Replace (13) with the following:

*(13) Conventional repeaters (i.e. mobile relays) must be able to be configured to reject (no repeat) all input transmissions with incorrect network access code (NAC) as described in TIA-102.BAAD-B Conventional Procedures section 2.5, with verification per the August 2016 CAI CAB which references TIA-102.CABA Conventional Interoperability Tests 2.4.1.4.1 (unaddressed voice call), 2.4.2.4.1 (group call), 2.4.11.4.1 & 2.4.11.4.2 (unit to unit calls).*

*(14) A fixed conventional repeater must be able to support the correct status symbol indicating when an input channel is busy in conformance with the following standard: TIA TSB-102.CABA, released December 11, 2013.*

**Discussion:** The referenced document is a P25 Standard Test document. Status symbol setting for a Conventional station/subscriber is described in P25 Standard BAAD-B section 2.6. There are no P25 Standard interoperability tests for setting, receiving or acting upon status symbols in any Conventional configuration type. The August 2016 CAI CAB does not include a test for setting, receiving or acting upon status symbols in any Conventional configuration type.

15. Recommendation: Delete (14) since there are no P25 tests or August 2016 CAI CAB tests specifically defined for status symbols, and the other specified CAP tests indirectly verify correct status symbol operation.

*(15) A fixed conventional repeater must be able to support the correct implementation of special reserved network access code (NAC) values \$293, \$F7E, and \$F7F in conformance with the following standard: TIA TSB-102.CABA, released December 11, 2013.*

**Discussion:** The referenced document is a P25 Standard Test document. Standard BAAC-C (April 2011) section 2.1 defines NAC value \$293 as a default value. There is no special functionality associated with this value for any Conventional configuration type. Standard BAAC-C (April 2011) section 2.1 and standard BAAD-B section 2.5 define unique operating characteristics associated with programmed NAC values of \$F7E and \$F7F. The operating characteristics of programmed NAC value \$F7E applies to all Conventional configuration types. The operating characteristics of programmed NAC value \$F7F applies to the Conventional Repeat configuration type only. The August 2016 CAI CAB does include tests for programmed NAC values \$F7E and \$F7F in the Conventional Repeat configuration type for group calls only.

16. Recommendation: Replace (15) with the following:

*(15) Conventional repeaters (i.e. mobile relays) must support the correct implementation of reserved network access code (NAC) values \$F7E and \$F7F as described in TIA-102.BAAD-B Conventional Procedures section 2.5, with verification per the August 2016 CAI CAB which references TIA-102.CABA Conventional Interoperability Tests 2.4.5.4.1 (\$F7F unaddressed voice call), 2.4.6.4.1 (\$F7F group call), 2.4.7.4.1 (\$F7E group call) and 2.4.10.4.3 & 2.4.10.4.4 (\$F7F unit to unit call).*

17. Comment regarding “marketing”

TIA also notes that in section VIII. FURTHER NOTICE OF PROPOSED RULEMAKING, Part B. Definition of Interoperability Features, the Commission: “seek comment on the recommended feature sets and capabilities, including whether to incorporate all, some or additional features into the Commission’s rules. “

TIA would like to point out that by requiring test results of some or all 15 functional items before equipment can be “marketed or sold”, the commission is essentially requiring that all new equipment “marketed or sold” must be capable of performing those functional items. TIA would like to point out that some functional items require equipment user interface capabilities in order to enable some features specified to be interoperable. As an example, item 5 (Private Calls) requires the ability of the equipment operator to enter a target ID. Adoption of this example item would prohibit the “marketing or sale” of equipment that is not capable of target ID entry by the operator. TIA questions whether prohibiting the “marketing or sale” of equipment without such operational capabilities was really intended by the commission. TIA also questions whether this side effect of the current language is in the best interest of the market place. TIA therefore suggests some modified language that calls for test results of only the functional items the equipment is capable of performing.

### III. CONCLUSION

For the foregoing reasons, TIA urges the Commission to act consistently with the recommendations above and to amend the Commission's rules accordingly.

Respectfully submitted,

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