

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of	)	
	)	
Bidirectional Sharing Pursuant to Ray Baum’s	)	GN Docket No. 19-128
Act of 2018	)	

**COMMENTS OF MOTOROLA SOLUTIONS, INC.**

Motorola Solutions, Inc. (“Motorola Solutions” or “MSI”) hereby files these comments in response to the Public Notice on Bidirectional Sharing Pursuant to Ray Baum’s Act of 2018.<sup>1</sup>

MSI is a global leader in mission-critical communications. Our technology platforms in communications, software, video and services make cities safer and help communities and businesses thrive.

Motorola Solutions maintains that the Federal Communications Commission (“FCC”), the National Telecommunications and Information Administration (“NTIA”) and Congress must recognize there is a continuing need for the U.S. spectrum management process to support the highly specialized communications needs of certain Federal and non-Federal users through the provision of dedicated spectrum allocations for non-commercial networks and systems.

**I. BACKGROUND.**

Pursuant to the Ray Baum’s Act of 2018<sup>2</sup>, the Commission is required to give notice and provide an opportunity for public comment before submitting a report to Congress that:

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<sup>1</sup> *Office of Engineering and Technology and Wireless Telecommunications Bureau Seek Comment on Bidirectional Sharing Pursuant to Ray Baum’s Act of 2018*, Public Notice, GN Docket No. 19-128, released May 1, 2019 (“Public Notice”).

<sup>2</sup> Repack Airwaves Yielding Better Access for Users of Modern Services (RAY BAUM’S) Act of 2018, Pub. L. 115-141, § 610, 132 Stat. 1080, 1108 (2018).

- (1) Considers the regulatory certainty that commercial spectrum users and Federal entities need to make longer-term investment decisions for shared access to be viable; and,
- (2) Evaluates any barriers to voluntary commercial arrangements in which non-Federal users could provide access to Federal entities.<sup>3</sup>

The Commission's report must be delivered to Congress by September 23, 2019. The instant Public Notice invites interested parties to provide comments to guide the Commission as it prepares this report.

## **II. COMMENTS.**

Specialized communication systems designed for the Department of Defense, Department of Homeland Security, the Department of Justice, State and local public safety organizations, public utilities and industrial and critical infrastructure industries will operate more efficiently, more securely, more capably, and, in many instances, more economically, when operated on networks free of non-critical commercial traffic. Attempts to consolidate all mission-critical communications into shared commercial networks can result in compromised performance and introduce heightened security risks for critical government data and information.

As the Commission, the NTIA and Congress consider recommendations for sustainable spectrum management strategies and plans, they should take note of the tremendous successes that have occurred over a relatively brief period of time. In MSI's view, the U.S. spectrum management process is far from broken. To the contrary, under the leadership of the FCC, the NTIA and Congress, the industry has completed a dynamic analog to digital changeover that has ushered in a plethora of devices and services that were mostly conceptual as recently as the mid-1990s: over-the-air HDTV, the Wi-Fi ecosystem, smartphones, and wireless mobile video to

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<sup>3</sup> Public Notice at 1.

name a few. With continued government leadership, MSI believes that the United States is well positioned to usher in the next level of technology advancements and lead the world in the development of advanced services such as 5G, telehealth, M2M, smart transportation, and homeland security technologies.

The key for success is to ensure that a transparent dialog is maintained where all spectrum stakeholders have the ability to clearly articulate their communications needs and requirements. The debate should not be simply focused on how much revenue can be derived through commercial auctions, as it is without question that the public interest is well served by the proliferation of services and user communities with needs that cannot be fully realized only over commercial wireless networks and systems. As it develops sustainable spectrum management strategies and plans, MSI recommends that the Commission, the NTIA and Congress ensure that the following principles remain at the core of the spectrum management process:

- There are Federal and non-Federal entities with special service requirements that are best served by specialized private networks;
- Rising to the top of the list of specialized needs is increased resilience to cybersecurity attacks initiated by terrorist organizations or nation states or other rogue organizations. Networks isolated or walled-off from commonly available networks offer improved resilience to cyberattacks. In contrast, the risk to cyberattacks is increased as more networks are operated over common cores.
- Federal and non-Federal entities with special service requirements need dedicated exclusive use spectrum as well as specialized shared spectrum. As the need for specialized service continues to increase for these Federal and non-Federal users, existing licensed spectrum minimally needs to be preserved and additional licensed spectrum allocations may be necessary.
- Shared spectrum should be pursued carefully with appropriate partners for innovative opportunities in bands where improved spectral utilization is desired and existing primary Federal and non-Federal users with special requirements can be fully protected and secured.

### **III. CONCLUSION.**

Motorola Solutions is a strong supporter of innovations that improve communications options and utilizes spectrum optimally. Motorola Solutions maintains that the Commission, the NTIA and Congress must recognize there is a continuing need for the U.S. spectrum management process to support the highly specialized communications needs of certain Federal and non-Federal specialized users through the provision of dedicated spectrum allocations for non-commercial networks and systems.

Respectfully Submitted,

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May 31, 2019