

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Procedures for Commission Review of State Opt-Out Requests from the FirstNet Radio Access Network)	PS Docket No. 16-269
)	

COMMENTS OF THE FIRST RESPONDER NETWORK AUTHORITY

The First Responder Network Authority (“FirstNet”) submits these comments in response to the Public Notice seeking comment on FirstNet’s interoperability requirements.¹ The Middle Class Tax Relief and Job Creation Act of 2012 (the “Act”) requires FirstNet to “develop...the technical and operational requirements of the network [and] practices, procedures, and standards for the management and operation of such network.”² Toward that end, on June 16, 2017, FirstNet submitted to the Federal Communications Commission (“Commission” or “FCC”) only the network policies that will be relevant to the Commission’s interoperability determination.³ FirstNet put considerable effort into creating its network policies, which have been informed by public safety stakeholder input and FirstNet collaboration with its nationwide public safety broadband network (“NPSBN”) partner, AT&T.⁴

Under the Act, the FCC is responsible for either approving or disapproving an alternative plan based on whether the state or territory has demonstrated that it will be (1) in compliance

¹ Public Notice, *Public Safety and Homeland Security Bureau Seeks Comment on FirstNet Ex Parte Submissions Proposing Interoperability Requirements for State Opt-Out Requests from the FirstNet Radio Access Network*, PS Docket No. 16-269, rel. June 28, 2017.

² 47 U.S.C. § 1426(c)(1)(B)-(C).

³ See Letter from Patrick Donovan, First Responder Network Authority, to Marlene H. Dortch, Secretary, Federal Communications Commission, PS Docket No. 16-269 (filed June 16, 2017)(“FirstNet June 16 Ex Parte”).

⁴ FirstNet provided the full set of initial network policies to states and territories when it delivered State Plans on June 19, 2017.

with the minimum technical interoperability requirements contained in the Interoperability Board Report (“Prong 1”), and (2) interoperable with the NPSBN (“Prong 2”).⁵ The Act tasked FirstNet with establishing the network policies for the NPSBN, including policies related to technical and operational requirements of the NPSBN.⁶ Thus, FirstNet is responsible for providing the FCC with the technical and operational requirements necessary to ensure that an opt-out State’s alternative plan will be “interoperable with the NPSBN” under Prong 2.

As noted above, to satisfy its statutory responsibility, FirstNet submitted the interoperability requirements for the NPSBN to the FCC for the Commission’s use in evaluating alternative plans.⁷ In so doing, FirstNet identified two additional requirements beyond the Prong 1 requirements that were adopted by the Commission in its Report and Order.⁸ These two requirements were included as requirements (“SHALLS”) [4]-[5] in the Interoperability Board Report.⁹

FirstNet identified the two additional requirements to highlight the need for an opt-out State’s Radio Access Network (“RAN”) to be able to support multiple Access Point Names (“APNs”) in order to ensure both interoperability and public safety custom usage.¹⁰ The FirstNet solution incorporates the use of general, specific, and custom APNs. While APN interoperability is primarily between the User Equipment (“UE”) and the Core Network, support of multiple

⁵ See 47 U.S.C. § 1442(e)(3)(C).

⁶ See 47 U.S.C. § 1426(c).

⁷ See FirstNet June 16 Ex Parte.

⁸ See *Procedures for Commission Review of State Opt-Out Requests from the FirstNet Radio Access Network*, Report and Order, FCC 17-75 (rel. June 22, 2017) (Report and Order) at ¶ 55.

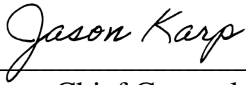
⁹ See Recommended Minimum Technical Requirements to Ensure Nationwide Interoperability for the Nationwide Public Safety Broadband Network, Final Report (May 22, 2013).

¹⁰ See FirstNet June 16 Ex Parte.

APNs in a device will also require the device to interoperate with the RAN in order to set up multiple default and dedicated bearers based on supported APNs. Accordingly, FirstNet included these two requirements in the revised interoperability compliance matrix as part of the Prong 2 requirements that will be necessary to ensure interoperability with the NPSBN.

Respectfully submitted,

FIRST RESPONDER NETWORK AUTHORITY

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