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July 26, 2018

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

**Re: The Colorado Public Safety Broadband Governing Body Request for Federal Communications Commission's ("FCC/Commission") Clarification on Guidelines for Commercial Network Interoperability for the Nationwide Public Safety Broadband Network, PS Docket No. 16-269; 12-94; 06-229; and 06-150**

Dear Ms. Dortch:

Cellular South, Inc., d/b/a C Spire ("C Spire"), which, for decades, has provided critical voice and data communications services to Mississippi first responders and public safety officials, submits this response in support of the Colorado Public Safety Broadband Governing Body ("Colorado") Request for Clarification on Guidelines for Commercial Network Interoperability for the nationwide public safety broadband network ("NPSBN"), filed with the Commission on July 6, 2018.

The foundation for Colorado's request is a December 2017 report – *Mission Critical Push-To-Talk (MCPTT) Implementation for Colorado* (the "Report") – commissioned by Colorado's Broadband Office. (A copy of the report is attached to Colorado's July 6 petition). The Report focuses on the implementation of Push-to-Talk ("PTT") and eventually Mission Critical Push-to-Talk ("MCPTT") as well as the integration of PTT and MCPTT functions with Colorado's existing Land Mobile Radio ("LMR") networks. The report analyzes the possible implementation of MCPTT within the state and concludes that the implementation of PTT and MCPTT in the FirstNet network would likely lead to interoperability issues. Colorado contends that any incident where multiple jurisdictions respond is likely to result in public safety communications taking place on multiple commercial carriers' networks. As a result, Colorado seeks standards or agreements to ensure prioritized interoperability, as first responders will continue to experience issues related to interoperability that will effectively leave the status quo unresolved. Specifically, absent additional guidance from the Commission, PTT and future MCPTT services

may develop in a way that presents public safety with fractured, and non-interoperable public safety communications systems.

In Mississippi, both AT&T (through FirstNet) and C Spire offer prioritized public safety services to state and local public safety users. We agree with Colorado that, given the current market share of both C Spire and AT&T in Mississippi, it is likely that during an incident in which many jurisdictions or agencies respond, multiple commercial networks will be providing communications services to public safety users.

Based on the current implementation of network-based applications such as PTT (and eventually MCPTT) we likewise foresee a situation where Mississippi's first responders will be unable to securely and directly communicate with other jurisdictions or agencies, as is currently available on Mississippi's existing, interoperable statewide P25 LMR network.

C Spire agrees with Colorado that, despite the critical need for interoperability, AT&T and FirstNet appear to have no intention of establishing standards or agreements with other commercial carriers to ensure prioritized interoperability for critical public safety applications and access.<sup>1</sup> We therefore concur with Colorado that the Commission should clarify that interoperability is a fundamental responsibility of FirstNet and that FirstNet must ensure interoperability is supported at all levels, including sharing priority and preemption protocols, applications, local control, non-mission critical and mission critical PTT communications and off-air device-to-device communications. We urge the FCC to promptly place Colorado's petition on Public Notice so that other interested parties and our nation's public safety agencies can provide their input through a clear and transparent process on the critical issue of interoperability.

In accordance with Section 1.1206(b)(2) of the Commission's rules, this letter is being filed electronically with your office. Please contact the undersigned with any questions in connection with this filing.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ben M. Moncrief". The signature is stylized and cursive.

Benjamin M. Moncrief  
Vice President, Government Relations

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<sup>1</sup> See, e.g., <http://urgentcomm.com/public-safety-broadbandfirstnet/att-exec-discusses-core-core-interoperability-verizon-proposal-first>