

July 27, 2017

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

Re: *Procedures for Commission Review of State Opt-Out Requests from the FirstNet Radio Access Network, PS Docket No. 16-269*

Dear Ms. Dortch:

On July 17, 2017, parties submitted comments in response to the Commission's public notice seeking comment on two versions of an Interoperability Matrix that FirstNet submitted to the Commission. All commenters other than AT&T and FirstNet that addressed the matrix emphasized the importance of a predictable and transparent opt-out process, which applies only interoperability criteria on which the public, and the states, have had ample notice and opportunity to comment.¹ Commenters also emphasized the importance of limiting these interoperability criteria to only those that are truly necessary to ensure interoperability, and the importance of core-to-core interconnection in allowing states to have necessary flexibility to address their public safety communications needs.² Verizon recently reiterated the importance of core-to-core interoperability.³ By transparently limiting interoperability review to those criteria necessary to ensuring interoperability across both core-to-core interconnection as well as direct core-to-RAN interconnection, the Commission would ensure that states' statutory right to opt out is not undermined by interoperability rules that strip states of the flexibility necessary to deploy the network that meets their needs.

¹ See Comments of Cellular South, Inc. at 3, PS Docket No. 16-269 (filed July 17, 2017) ("C Spire Comments"); Comments of Competitive Carriers Association at 9-10, PS Docket No. 16-269 (filed July 17, 2017) ("CCA Comments"); FirstNet Colorado Governing Body's Comments on FirstNet Ex Parte Submissions Proposing Interoperability Requirements for State Opt-Out Requests at 3-4, PS Docket No. 16-269 (filed July 17, 2017) ("FirstNet Colorado Comments"); Comments of Rivada Networks, LLC at 6, 8-9, PS Docket No. 16-269 (filed July 17, 2017) ("Rivada Comments"); Comments of Southern Communications Services, Inc. at 6-7, PS Docket No. 16-269 (filed July 17, 2017) ("SouthernLinc Comments").

² See C Spire Comments at 2-3; CCA Comments at 5; FirstNet Colorado Comments at 3-4; Rivada Comments at 6; SouthernLinc Comments at 7-9.

³ Letter from William H. Johnson, Senior Vice President, Federal Regulatory and Legal Affairs, Verizon, to Marlene H. Dortch, Secretary, Federal Communications Commission, at 1-2, PS Docket No. 16-269 (filed July 24, 2017).

Simultaneously, AT&T and FirstNet filed comments demonstrating the importance of such assurances. Both filed comments elaborating on the two Prong 2 requirements included in the Interoperability Matrix,⁴ *SHALLs* 4 and 5 from the RMTR, which relate to support of multiple, custom Access Point Names (“APNs”):

[4] Hardware and software systems comprising the NPSBN SHALL support APNs defined for PSAN usage.

[5] Hardware and software systems comprising the NPSBN SHALL support nationwide APNs for interoperability.⁵

Like the other criteria listed in the Interoperability Matrix, these two requirements place few restrictions on states’ abilities to design the network that will best serve their first responders. These requirements can be met in multiple configurations including core-to-core interconnection as well as the use of a monolithic FirstNet core.

APNs are simply addresses used to identify certain network resources⁶—for example, as AT&T explains, a network may use separate APNs for “public internet access; IP Multimedia Subsystems (‘IMS’) such as VoLTE and IP messaging; E911; [and] access to enterprise intranets.”⁷ All LTE Networks leverage APNs. It is logical, therefore, that APNs should be harmonized between the state and nationwide networks so that any user device can reliably locate the network resources it needs anywhere in the country. For opt-out states that implement their own LTE cores and, accordingly, provide their own implementations of network resources tailored to the state’s needs, those resources can be defined by separate APNs that are recognized throughout the national network.

AT&T goes further, however, and claims that each state network must use the “very same multiple APNs” for each resource.⁸ But neither the RMTR nor the Interoperability Matrix contains such a requirement. The Interoperability Matrix and the RMTR provide only that these networks must “support nationwide APNs,”⁹ not that each type of resource must be identified by the same APN throughout the network. Indeed, the latter is completely unnecessary. The use of

⁴ Comments of the First Responder Network Authority at 2-3, PS Docket No. 16-269 (filed July 17, 2017); Comments of AT&T Services, Inc. at 6-7, PS Docket No. 16-269 (filed July 17, 2017) (“AT&T Comments”).

⁵ Technical Advisory Board for First Responder Interoperability, *Recommended Minimum Technical Requirements to Ensure Nationwide Interoperability for the Nationwide Public Safety Broadband Network*, Final Report § 1.3.1 (2012) (“RMTR”).

⁶ Christopher Cox, An Introduction to LTE: LTE, LTE-Advanced, SAE, VoLTE and 4G Mobile Communications 25 (2d ed. 2014) (“Each packet data network is identified by an access point name (APN)”).

⁷ AT&T Comments at 6.

⁸ *Id.*

⁹ RMTR § 1.3.1.

different APNs for a given resource within state networks would pose no impediment to seamless interoperability so long as each of those APNs is recognized nationwide, as the RMTR requires.

AT&T also claims that compliance with these interoperability requirements “would require any opt-out state’s RAN and devices (‘User Devices’ or ‘UEs’) to support the instructions received from FirstNet’s core regarding bearer assignments/resources.”¹⁰ But this also goes well beyond the recommendations in the RMTR and the Interoperability Matrix, and is unnecessary for interoperability, in that it assumes the use of a single national core. The applicable standards readily support both core-to-core interconnectivity and the use of national APNs.

Rather than *bona fide* interoperability requirements, AT&T’s assertions appear to be an attempt to require states to use AT&T’s national LTE core. In so doing, AT&T highlights the importance of an interoperability review process that provides ample opportunity for public comment on any potential interoperability requirements, and which avoids any reliance on additional restrictions that might seem to be derived from the announced criteria. In this case, the Commission should avoid inflating the RMTR’s and FirstNet’s limited recommendation that state networks must “support nationwide APNs” into an unnecessary, unsupported, and arbitrary requirement that all networks use the same APNs to identify the same resources or, more radical still, that they may not use their own implementations of these resources at all. Likewise, it should construe the other requirements listed in the Interoperability Matrix narrowly, to ensure the Commission does not unnecessarily restrict states’ abilities to meet the communications needs of their public safety officials.

Sincerely,



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cc: Zenji Nakazawa
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¹⁰ AT&T Comments at 7.