

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

In the Matter of	)	
	)	
Wireless Telecommunications Bureau Seeks	)	
Comment on Arizona Public Service Company	)	WT Docket No. 17-168
Request for Waiver of 800 MHz Licensing Freeze for	)	
Proposed Statewide Trunked Radio System	)	
	)	

**COMMENTS OF THE  
TELECOMMUNICATIONS INDUSTRY ASSOCIATION**

The Telecommunications Industry Association (“TIA”)<sup>1</sup> hereby files these comments in response to the June 16, 2017 Public Notice<sup>2</sup> in the above-captioned proceeding. TIA’s member companies provide hardware and services for radio systems throughout the frequency bands concerned in this proceeding and have a long history working with users and regulators to ensure quality, reliable communications. These members command a wealth of experience and expertise on this subject.<sup>3</sup>

Without weighing in on the merits of this particular waiver request, TIA urges the Commission to act quickly to lift the licensing freeze on the 800 MHz Expansion Band. As the Commission knows, this proceeding has been mired in bureaucratic process for over a decade.<sup>4</sup> This waiver request, along with similar requests, demonstrate that the Expansion Bands are necessary for investment and innovation in public service communications, and that the rebanding necessary to end this freeze is long overdue for completion. TIA members, Land Mobile Radio users, and Commission staff are all significantly burdened when regulation can only take place through a piecemeal waiver process.

We thank you for the opportunity to comment on this proceeding, and welcome any questions.

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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. TIA represents its members on policy issues affecting the ICT industry and forges consensus on industry standards.

<sup>2</sup> See Public Notice, *Wireless Telecommunications Bureau Seeks Comment on Arizona Public Service Company Request for Waiver of 800 MHz Licensing Freeze for Proposed Statewide Trunked Radio System*, DA 17-590, WT Docket No. 17-168 (June 16, 2017).

<sup>3</sup> TIA members include Airbus Defence & Space, Harris Corporation, ICOM America, Motorola Solutions, Nokia, and numerous others in the public safety sector.

<sup>4</sup> See Report and Order, Fifth Report and Order, Fourth Memorandum Opinion and Order, and Order, *Improving Public Safety Communications in the 800 MHz Band*, FCC 04-168, WT Docket No. 02-55 (July 8, 2004) (*800 MHz Report and Order*).

Respectfully submitted,

**TELECOMMUNICATIONS INDUSTRY ASSOCIATION**

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