

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

In the Matter of	)	
	)	
Proposed Amendments to the Service Rules	)	PS Docket No. 13-87
Governing Public Safety Narrowband Operations in	)	
the 769-775/799-805 MHz Bands	)	
	)	
National Public Safety Telecommunications	)	RM-11433
Council Petition for Rulemaking on Aircraft Voice	)	
Operations at 700 MHz	)	
	)	
National Public Safety Telecommunications	)	RM-11433
Council Petition for Rulemaking to Revise 700	)	
MHz Narrowband Channel Plan	)	
	)	
Region 24 700 MHz Regional Planning Committee	)	WT Docket No. 96-86
Petition for Rulemaking	)	PS Docket No. 06-229
	)	
State of Louisiana Petition for Rulemaking	)	RM-11577

**UPDATE FROM THE PROJECT 25 COMPLIANCE ASSESSMENT PROGRAM ADVISORY PANEL<sup>1</sup>**

The Project 25 (P25) Compliance Assessment Program Advisory Panel (CAP AP) submits the following clarifications to the Commission's Notice of Proposed Rulemaking (Notice) in the above-captioned proceedings.<sup>2</sup>

In the October 2016 filing, the CAP AP recommended the removal of the private call feature called out in 90.548(d)(5). The CAP AP continues to support the recommendation to remove the 'private call' feature from the minimum features. The CAP AP has discovered that test cases for 'unit-to-unit

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<sup>1</sup> The FCC member of the P25 Compliance Assessment Program Advisory Panel did not participate in Panel deliberations or otherwise with respect to these viewpoints or comments filed with the Commission.

<sup>2</sup> Proposed Amendments to the Service Rules Governing Public Safety Narrowband Operations in the 769-775/799-805 MHz Bands, Order on Reconsideration and Further Notice of Proposed Rulemaking, FCC 16-111 (rel. Aug. 22, 2016) (Notice).

call', also known as 'private call', were not removed from the repeater feature testing. For consistency, the CAP AP recommends the removal of the following test cases that are related to unit to unit call (aka private call):

For 90.548(d)(11), removal of Test Case 2.4.10.4.1 and Test Case 2.4.10.4.2 is recommended.

For 90.548(d)(13), removal of Test Case 2.4.11.4.1 and Test Case 2.4.11.4.2 is recommended.

For 90.548(d)(15), removal of Test Case 2.4.10.4.3 and Test Case 2.4.10.4.4 is recommended.

In the October 2016 filing, the CAP AP recommended testing for group calls in 90.548(d)(4) that included a test case for subscriber testing with a repeater while the repeater was also connected to a dispatch console, i.e., test case 2.6.2.4.1. After further consideration, the CAP AP believe the other test cases already included are sufficient and the test case that requires a dispatch console connection can be removed.

For 90.548(d)(4), removal of test Case 2.6.2.4.1 is recommended.

#### Updated summary of the P25 CAP AP recommendations for 90.548 Interoperability Technical Standards

*(d) Mobile and portable transceivers and repeater transceivers must at a minimum include the following feature sets and capabilities while operating in the conventional mode in order to be validated for compliance with the Project 25 standards.*

*(1) Remove*

*(2) Remove*

*(3) Remove*

*(4) A subscriber unit must be capable of issuing group calls in a conventional system in conformance with the following standards: TIA 102.BAAD-B Conventional Procedures (2015), Section 6.1 with validation testing according to TIA-102.CABA Interoperability Testing for Voice Operation in Conventional Systems (2010), Test Case 2.2.2.4.1, Test Case 2.4.2.4.1*

*(5) Remove*

*(6) Two Project 25 standard squelch modes, Monitor Squelch and Normal Squelch, must be supported in conformance with the following standards: TIA 102.BAAD-B Conventional Procedures*

*(2015), Section 6.1.1.3 with validation testing in according to TIA-102.CABA Conventional Interoperability Testing for Voice Operation in Conventional Systems (2010), Test Case 2.2.3.4.1, Test Case 2.2.1.4.1 (Direct, normal squelch), Test Case 2.4.9.4.1 (Repeated, monitor squelch), Test Case 2.4.1.4.1 (Repeated, normal squelch).*

*(7) A subscriber unit must properly implement the conventional network access codes values (NAC) of \$293 and \$F7E in conformance with the following standards: TIA-102.BAAC-C Common Air Interface Reserved Values (2011), Section 2.1 with validation testing according to TIA-102.CABA Interoperability Testing for Voice Operation in Conventional Systems (2010), Test Case 2.2.1.4.1 and Test Case 2.2.8.1.*

*(8) Remove*

*(9) Remove*

*(10) Remove*

*(11) A fixed conventional repeater must be able to repeat the correct/matching network access code (NAC) for all subscriber call types (clear and encrypted) using the same output NAC in conformance with the following standards: TIA 102.BAAD-B Conventional Procedures (2015), Section 2.5 with validation testing according to TIA-102.CABA Interoperability Testing for Voice Operation in Conventional Systems (2010), Test Case 2.4.1.4.1, Test Case 2.4.2.4.1-*

*(12) A fixed conventional repeater must be able to repeat the correct/matching network access code (NAC) for all subscriber call types (clear and encrypted) using a different output NAC in conformance with the following standards: TIA 102.BAAD-B Conventional Procedures (2015), Section 2.5 with validation testing according to TIA-102.CABA Interoperability Testing for Voice Operation in Conventional Systems (2010), Test Case 2.4.3.4.1 and Test Case 2.4.4.4.1.*

*(13) A fixed conventional repeater must be able to reject (no repeat) all input transmissions with incorrect network access code (NAC) in conformance with the following standard: TIA 102.BAAD-B Conventional Procedures (2015), Section 2.5 with validation testing according to TIA-102.CABA Interoperability Testing for Voice Operation in Conventional Systems (2010), Test Case 2.4.1.4.1, Test Case 2.4.2.4.1*

*(14) Remove*

*(15) A fixed conventional repeater must be able to support the correct implementation of network access code (NAC) values \$F7E and \$F7F in conformance with the following standards: TIA 102.BAAD-B Conventional Procedures (2015), Section 2.5 with validation testing according to TIA-*

*102.CABA Interoperability Testing for Voice Operation in Conventional Systems (2010), Test Case 2.4.5.4.1, Test Case 2.4.6.4.1, Test Case 2.4.7.4.1*

### Conclusion

P25 CAP AP believes testing of its baseline features recommended for inclusion in 90.548(d) is required for equipment that is capable of operating on the 700 MHz interoperability channels. Once this requirement exists, equipment interoperability for the 700 MHz interoperability channels is a known and tested quantity, not just of the P25 conventional radio interface, but also for a baseline set of Project 25 features and capabilities before P25 equipment is acquired and put into use.

Respectfully submitted,

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P25 Compliance Assessment Program Advisory Panel

September 15, 2017