



December 9, 2014

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

Re: Notice of *Ex Parte* Communication, PS Docket No. 13-87; PS Docket No. 06-229, WT Docket No. 96-86, RM-11433 Service Rules Governing Narrowband Operations in the 769-775/799-805 MHz Bands (“Report and Order”)

Dear Ms. Dortch:

On December 5, 2014 Mark Uncapher, Director of Regulatory and Government Affairs for Telecommunications Industry Association (“TIA”),<sup>1</sup> Roy McClellan, Airbus; John Oblak, EF Johnson; Bill Janky and Alan Wilson of Harris Corporation; Andy Davis, David Eierman, and Chuck Powers of Motorola Solutions; and Chris Lougee of Icom America conducted a telephone conference call with John Evanoff, Brian Marengo, Roberto Mussenden and Michael Wilhelm of the FCC Public Safety & Homeland Security Bureau and Tim Harrington and Mark Neumann of the FCC Office of Engineering and Technology to discuss the Conformity Assessment Program certification language in the 700 MHz Public Safety Narrowbanding Report and Order.

In the meeting, TIA addressed paragraph 60 of the Report and Order, in which the Commission amended applicable rules to further encourage voluntary Conformity Assessment Program (“CAP”) compliance and to give licensees information regarding the basis for vendor assertions that equipment is interoperable. Company participants expressed strong support for CAP, although noted that CAP faces continuing funding and other organizational challenges.

Concern was raised, however, about requiring CAP certification at the time of submission to the FCC for type approval. CAP certification depends on the availability of competing products for interoperability testing to be conducted. Consequently requiring CAP interoperability at the time of application could delay new product introduction, particularly in the case of “first to market” products. Additional discussion also addressed the CAP certification’s consistency with P-25 standards.

---

<sup>1</sup> TIA is a Washington, DC-based trade association and American National Standards Institute (ANSI)-accredited standard developer that represent the global information and communications technology (“ICT”) manufacturer, vendor, and supplier community. TIA represents approximately 500 participating companies producing products and services empowering communications in every industry and market, including healthcare, education, security, public safety, transportation, government, and the military, the environment, and entertainment. See <http://tiaonline.org/>.

To the extent that the Report & Order's anticipated approval chronology should be modified in order to permit submission to the FCC type acceptance before CAP certification can be completed, then a petition for reconsideration may be necessary.

Pursuant to Section 1.1206 of the Commission's rules,<sup>2</sup> this letter is being electronically filed via ECFS and a copy of this submission is being provided electronically to the meeting attendees.

Respectfully submitted,

**TELECOMMUNICATIONS INDUSTRY ASSOCIATION**

By: /s/ Mark Uncapher

Mark Uncapher  
Director, Government Affairs

**TELECOMMUNICATIONS INDUSTRY ASSOCIATION**

1320 Court House Road

Suite 200

Arlington, VA 22201

(703) 907-7700

cc:

John Evanoff, FCC

Brian Marenco, FCC

Roberto Missenden, FCC

Michael Wilhelm, FCC

Tim Harrington, FCC

Mark Neumann, FCC

Roy McClellan, Airbus;

John Oblak, EF Johnson;

Bill Janky, Harris Corporation;

Alan Wilson, Harris Corporation;

Andy Davis, Motorola Solutions

David Eierman, Motorola Solutions

Chuck Powers, Motorola Solutions

Chris Lougee, Icom America

---

<sup>2</sup>

*See* 47 C.F.R. § 1.1206.