MOTOROLA

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January 13, 2000

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
The Portals, TW-A325
445 12th Street, S.W.
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: WT Docket No. 96-86; WTB-2; WT Docket 99-168

Dear Ms. Salas:

This letter is written on behalf of Motorola, Inc. (Motorola). On Wednesday, January 12, 2000, Wayne Leland, Corporate Vice President and Director, Commercial, Government, Industrial Systems Solutions, Motorola and Jeanine Poltronieri, Director, Telecommunications Strategy and Regulation, Motorola, met with Kathleen Wallman, Chair, National Coordination Committee (NCC), and Michael Wilhelm, Designated Federal Officer, NCC. The parties discussed issues related to the ongoing work of the NCC.

Motorola discussed ANSI/TIA/EIA 102.BAAA-1 (ANSI-102) Project 25 FDMA Common Air Interface (Project 25). The NCC Technology Subcommittee recently chose ANSI-102 as the preferred technology for narrowband interoperability by consensus. Mr. Leland pointed out several attributes of Project 25 spectral efficiency relating to the backward compatibility requirements for Phase II radios. The requirement for backward compatibility to Project 25 Phase I is required by the standards documents for all Project 25 Phase II radios, whether they are manufactured using the FDMA standard, which has already been adopted, or the two Time Division Multiple Access (TDMA) proposals which have been accepted by the Project 25 Steering Committee. Ericcson and the European Telecommunications Standards Institute (ETSI) Terrestrial Trunked Radio (TETRA) Memorandum of Understanding group have made the TDMA proposals. Mr. Leland pointed out that the Ericsson TDMA proposal will not interoperate with the TETRA TDMA proposal, and neither will interoperate with the FDMA 6.25 kHz standard. All three technologies, however, will have an interoperability mode using Project 25 Phase I, 12.5 kHz. This means that all new technology proposals will interoperate on 12.5 kHz channels. If the NCC were to choose one of the 6.25 kHz proposed standards, it would exclude the other technologies, since they do not interoperate in 6.25 kHz mode, effectively reducing user's choice and competition.

In addition, Mr. Leland discussed the needs of public safety users to gain access to the spectrum in the 700 MHz band quickly. Some public safety users are looking to the 700 Mhz band as an expansion band to supplement their operations at 800 Mhz, and this may be a viable option in areas where incumbent television channels have been cleared or where these television channels were never in use. Equipment manufactured using the ANSI-102 standard can be made

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available quickly for these and other public safety users, as there is already equipment manufactured for the 800 MHz band to the ANSI-102 standard. Were the NCC to chose a technology operating on a 6.25 kHz channel width for the interoperability standard, there would be additional delay as no equipment using that channel width is currently being manufactured. Mr. Leland expressed his view that quick action from the Federal Communications Commission choosing an interoperability standard after their receipt of the NCC's recommendations would facilitate fast deployment of interoperable equipment for public safety users, and realize Congressional intent for a nationwide, interoperability public safety radio system in the 700 MHz band.

Discussion turned to the status of WT Docket 99-168. Motorola expressed its continued support of the previous NCC filing in the docket.

Please contact Jeanine Poltronieri at (202) 371-6896 regarding any questions concerning this matter.

Respectfully Submitted,

Jeanine Poltronieri

Jeanine Poltronieri
Director
Motorola, Inc.

Cc:
Kathleen M.H. Wallman, Chair, National Coordination Committee;
Michael Wilhelm, Designated Federal Officer, National Coordination Committee