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December 13, 2000

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

Re: WT Docket No. 96-86

Dear Ms. Salas:

This letter is written on behalf of Motorola, Inc. (Motorola). On December 12, 2000, Motorola Rich Barth and Jeanine Poltronieri of the Government Relations Office met with Bryan Tramont, Legal Advisor to Commissioner Harold Furchtgott-Roth. 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), which was selected in an open consensus-based process by the NCC as the preferred technology for narrowband interoperability. Consistent with its comments filed in the proceeding, Motorola expressed its views that:

- Public safety users need to gain access to the spectrum in the 700 MHz band quickly. APCO recommended an end of November deadline for adoption of rules. Quick action from the FCC will facilitate fast deployment of interoperable equipment for public safety users, and realize Congressional intent to promote interoperability in the 700 MHz band among public safety users nationwide.

- Project 25 Phase I was chosen by the NCC as the standard for interoperability for a number of reasons. One of these reasons is that this choice is suitable to the entire range of public safety users who will utilize this spectrum. Project 25 provides scalability that allows both small, rural public safety agencies and larger, urban public safety agencies to use the same technology and interoperate. While certain other technologies may accommodate the needs of high density/concentrated geography systems, they will not address the needs of the small, rural agency that must cover a large footprint.

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- Equipment for the public safety community that utilizes a 6.25 KHz channel width cannot be manufactured to be acceptable for U.S. public safety users in the near term. This is because implementation of such equipment requires more power than the 12.50 kHz alternatives. Thus, users who wish to implement a 6.25 kHz public safety system at this time have two unacceptable alternatives. First, provide the radio with more battery power with the tradeoff that the battery drain will be substantial and the battery will not last for the entire shift. Second, place the radio on a system that contains more infrastructure and more base stations such that a lower power radio can still satisfy coverage requirements. Adding this infrastructure and base stations will add to costs of installation and site acquisition, especially for rural public safety agencies that must cover large geographic areas. These issues will be addressed, but will not be addressed in a way that will be cost effective for all public safety users, including those who must cover large geographic areas with low population density, for a number of years.

- The efficiency of radio systems must be judged in a real world context. Purported efficiency gains from using a 6.25kHz channel width are not realized when radios are used in the direct mode and not through infrastructure. This mode is commonly used by many public safety agencies in the U.S., especially in rural areas.

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

Respectfully Submitted,

Jeanine Poltronieri
Director
Motorola, Inc.

Cc:

Bryan Tramont, Legal Advisor to Commissioner Harold Furchtgott-Roth