

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

In the Matter of)	
)	
Reallocation of 30 MHz of 700 MHz Spectrum (747-762/777-792 MHz) from Commercial Use)	RM 11348
)	
Assignment of 30 MHz of 700 MHz Spectrum (747-762/777-792 MHz) to the Public Safety Broadband Trust for Deployment of a Shared Public Safety/ Commercial Next Generation Wireless Network)	

To: The Commission

ERRATUM

Cyren Call Communications Corporation (“Cyren Call”) respectfully submits an erratum to its December 14, 2006 Reply Comments in the above-entitled proceeding.¹ Specifically, Cyren Call wishes to replace the map referenced in Attachment 4 to that filing with the current map of Proposed Satellite and Terrestrial Coverage for the 700 MHz shared governmental/commercial network described in the Cyren Call Petition which is attached hereto as Attachment 1.² The revised coverage map provides details that were not included on the map filed previously and clarifies the extent of network coverage in Hawaii, Alaska and Puerto Rico.

Cyren Call also must take this opportunity to correct any misimpression about the breadth and depth of public safety support for its proposal that might have arisen from the Reply Comments of MetroPCS Communications, Inc. (“MetroPCS”). In those Reply Comments, MetroPCS stated that “the number of entities that chose to file these ‘pre-packaged’ comments

¹ *Public Notice*, Report No. 2794 (rel. Oct. 30, 2006).

² Petition for Rulemaking of Cyren Call Communications Corporation, RM 11348, filed April 27, 2006.

could be read to indicate that not many members of the public safety community consider the Cyren Call proposal to be important enough to warrant or merit individualized attention and comment.”³

This statement fails to appreciate or to recognize two essential points. First, it is extraordinary that so many individuals with public safety responsibility took time to file any comments in this proceeding at all. Those who spend their days protecting our lives and property generally have little experience in crafting letters to the FCC and often are not comfortable in doing so. The fact that they were sufficiently interested in this issue to search out the Cyren Call website, to read the letter, and to submit it to the FCC speaks volumes about the Public Safety community’s commitment to the principles in the Cyren Call Petition.⁴

Moreover, MetroPCS apparently fails to appreciate the tens or hundreds of thousands of Public Safety providers that are represented by organizations that filed detailed comments in support of the Cyren Call Petition. For example, NPSTC, the National Public Safety Telecommunications Council, is comprised of the following organizations, each of which represents very large numbers of Public Safety members:

- American Association of State Highway Transportation Officials
- Association of Fish & Wildlife Agencies
- American Radio Relay League
- American Red Cross
- Association of Public-Safety Communications Officials-International
- Forestry Conservation Communications Association
- International Association of Chiefs of Police
- International Association of Emergency Managers
- International Association of Fire Chiefs
- International Municipal Signal Association
- National Association of State Emergency Medical Services Officials

³ Comments of MetroPCS Communications, Inc. at 3.

⁴ Of course, if one considers interoperability requirements to be “local, pedestrian, mundane, and constant” as MetroPCS has described them, then it may be difficult to appreciate the urgency with which just that aspect of the Cyren Call proposal resonates within the Public Safety community.

- National Association of State Foresters
- National Association of State Telecommunications Directors

Similarly, the Sacramento Regional Radio Communications System (“SRRCS”) represents the internal communications and mutual aid interests of the following organizations in the greater Sacramento area:

- California Department of Transportation
- City of Citrus Heights, Police and Local Government
- City of Elk Grove, Police and Local Government
- City of Folsom Fire Department and Local Government
- City of Folsom Police Department
- City of Sacramento Fire Department and Local Government
- City of Sacramento Police Department
- City of West Sacramento Fire Department, Parks and Public Works
- City of West Sacramento Police
- County of Sacramento Sheriff’s Department
- County of Sacramento Local Government and Public Works
- Courtland Fire Department
- Elk Grove Fire Department
- Grant Joint Union High School District
- Herald Fire Department
- Los Rios Community College District
- Sacramento Regional Transit District
- Sacramento Metropolitan Fire District
- Sacramento Regional Fire/EMS Dispatch Center
- Sacramento Regional Waste Water Treatment Plant
- Sacramento Transportation Authority (Freeway Service Patrol)
- Walnut Grove Fire Department
- Wilton Fire Department

Surely MetroPCS is not suggesting that such well established and respected public safety organizations as NPSTC and SRRCS are so out of touch with the concerns, interests, positions and priorities of their constituent entity members and, beyond that, of the individual Public Safety providers that make up the membership of those constituent organizations, that they would craft and submit comments to the FCC that do not reflect the views of those they represent.

The principles of the Cyren Call Petition have elicited a level of individual and collective endorsement from the Public Safety community that is, by any standard, extraordinary. MetroPCS's effort to denigrate the quantity and quality of that endorsement has no basis in fact and should be dismissed as an ill-considered effort to obfuscate the unambiguous record in this proceeding.

Respectfully submitted,

**CYREN CALL COMMUNICATIONS
CORPORATION**

By: _____ /s/
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ATTACHMENT 1

