

## **FCC Ninth Notice of Proposed Rulemaking**

Rivada Networks agrees that a public-private commercial approach is the best way to resolve the public safety communications problem. Rivada Networks also agrees that leveraging existing Commercial Mobile Radio Services (CMRS), is a cost effective and time efficient way of achieving Public Safety objectives.

However, Rivada Networks does not believe that spectrum in the 700MHz band should be given free of charge to any public safety or other operator. In addition, Rivada Networks believes that public safety communications should not be entrusted solely to any one owner of spectrum assets or to any one infrastructure owner.