

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20554**

In the Matter of)	
)	
Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band)	PS Docket No. 06-229
)	
Development of Operational, Technical and Spectrum Requirements for Meeting Federal, State and Local Public Safety Communications Requirements Through the Year 2010)	WT Docket No. 96-86
)	

REPLY COMMENTS OF VERIZON WIRELESS

Verizon Wireless submits these reply comments in response to the Federal Communications Commission’s (“Commission’s”) Ninth Notice of Proposed Rulemaking (“*Ninth NPRM*”) in the above-captioned proceeding.¹ Comments filed in response to the *Ninth NPRM* demonstrate broad support for the construction of a nationwide, interoperable, broadband public safety network, and conclude that such a network is the best way to provide first responders with access to advanced communications capabilities. In light of this support, we urge the Commission to move ahead quickly to implement its proposed plan.

In the *Ninth NPRM*, the Commission proposes an innovative and forward-looking approach to satisfy public safety’s emergency communications needs and promote the deployment of a nationwide, interoperable broadband network for its use. By allocating

¹ *In the Matter of Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band*, PS Docket No. 06-229, *Development of Operational, Technical and Spectrum Requirements for Meeting Federal, State and Local Public Safety Communications Requirements Through the Year 2010*, WT Docket No. 96-86, Ninth Notice of Proposed Rulemaking, FCC 06-181 (rel. Dec. 20, 2006) (“*Ninth NPRM*”).

12 MHz of the 700 MHz public safety spectrum for broadband use, assigning it to a single national public safety licensee, and establishing rules that promote the use of commercial “off-the-shelf” technologies, the Commission can ensure the efficient and effective use of the spectrum provided by Congress, while providing numerous benefits for public safety. These benefits include inherent interoperability, access to advanced broadband technologies with a clear path to future innovation, improved reliability and survivability, reduced capital and operating costs, increased spectral efficiency, and a more focused and effective use of scarce funds available from federal and state sources.

Public safety entities and others filing comments with the Commission noted the considerable benefits that would be afforded to public safety through a nationwide, interoperable, broadband public safety network.² The Missouri State Highway Patrol (“MSHP”), which has considerable experience in public safety communications and managing public safety spectrum, states that “a national licensee of the 12 MHz of data public safety spectrum in the 700 MHz band is the best method of promoting and implementing public safety’s next generation communications needs.”³ It concludes that a national licensee will act as the “enabling entity” that will provide the required guidance and direction to maximize opportunities to share resources among various

² See Comments of the Missouri State Highway Patrol (“*MSHP Comments*”), PS Docket No. 06-229, filed Feb. 26, 2007; see also Comments of the State of Nebraska Division of Communications (“*Nebraska Comments*”), PS Docket No. 06-229, filed Feb. 26, 2007; see also Comments of APCO (“*APCO Comments*”), PS Docket No. 06-229, filed Feb. 26, 2007; see also Comments of the National Public Safety Telecommunications Council (“*NPSTC Comments*”), PS Docket No. 06-229, filed Feb. 26, 2007; see also Comments of the Region 39, 700 MHz Regional Planning Committee (“*Region 39 RPC Comments*”), PS Docket No. 06-229, filed Feb. 26, 2007; see also Comments of the First Response Coalition, PS Docket No. 06-229, filed Feb. 26, 2007; see also Comments of the High Tech DTV Coalition (“*DTV Coalition Comments*”), PS Docket No. 06-229, filed Feb. 26, 2007; see also Comments of CTIA-The Wireless Association, PS Docket No. 06-229, filed Feb. 26, 2007; see also Comments of the Enterprise Wireless Alliance, PS Docket No. 06-229, filed Feb. 26, 2007; see also Comments of Cisco Systems, Inc. (“*Cisco Comments*”), PS Docket No. 06-229, filed Feb. 26, 2007.

³ *MSHP Comments* at 1.

public safety entities and leverage resources available from the commercial sector.⁴ “For too long,” MSHP states, “public safety agencies have been required to operate independently within the Commission’s rules often without the benefit or complete knowledge as to what implications their actions had on surrounding agencies.”⁵

The State of Nebraska Division of Communications agrees, stating that “public safety interests in 700 MHz development will be best served by a national licensee.”⁶ It states that “public safety does not possess the means to create and sustain its own nationwide voice and data network,” and concludes that a national licensee should be created to manage this process in the interests of public safety.⁷

Even those public safety entities that do not support all aspects of the Commission’s proposal agree that a nationwide, interoperable, broadband network is needed. The Association of Public-Safety Communications Officials-International (“APCO”) previously endorsed the construction of a nationwide broadband public safety network, and states “there are particular advantages to having a single licensee” for such a network.⁸ APCO recognizes that the enhanced position of a national licensee could facilitate a more effective public-private partnership that could include, for example, infrastructure sharing arrangements or spectrum lease arrangements that would create non-traditional funding sources. It states that “a national licensee could more easily enter into such infrastructure sharing arrangements with commercial wireless companies, and

⁴ *Id* at v.

⁵ *Ibid.*

⁶ *Nebraska Comments* at 3.

⁷ *Id* at 2.

⁸ *APCO Comments* at 5.

could more efficiently manage the provision of ‘excess capacity’ to non-public safety entities on a preemptible basis.”⁹

The National Public Safety Telecommunications Council (“NPSTC”) also recognizes the considerable benefits afforded by a nationwide broadband network for public safety’s use. In its comments to the *Ninth NPRM*, it states:

“It has become increasingly apparent to NPSTC that deployment of a nationwide public safety broadband network is enormously important for emergency responders at all levels of government: local, state, and federal. It will be an essential tool for addressing the expanded domestic defense and emergency response obligations of all public safety agencies.”¹⁰

NPSTC states that it believes the construction of a nationwide broadband network will improve emergency communications dramatically and “bring the unity that is vitally necessary to public safety operations.”¹¹

The Region 39 – 700 MHz Regional Planning Committee highlights the paradigm shift from voice-only communications to voice and data that is occurring within the public safety community. It states that a “single national licensee could provide a cost effective and spectrally efficient voice and data system,” and concludes that “individual public safety agencies will never build a system of system[s] unless the Federal Government issues a mandate or builds the system itself.”¹² Region 39 views the *Ninth NPRM* as an opportunity for public safety and industry to work together to deploy a broadband solution that is more cost effective and affordable for all.

⁹ *Id* at 6.

¹⁰ *NPSTC Comments* at 1-2.

¹¹ *Id* at 3.

¹² *Region 39 RPC Comments* at 3.

Indeed, the paradigm shift to broadband technologies and data-centric networks has been happening in the commercial sector for some time. The time has come for the public safety community to fully embrace this shift. In discussing the benefits of IP-based technologies, Cisco notes that broadband networks that employ such technology “will increase the reliability, adaptability, and recoverability of public safety communications.”¹³ It concludes that the establishment of a nationwide, interoperable broadband public safety network which is operated by a single national licensee will also “enhance interoperability, encourage innovation in the development of broadband technologies, services and products, and foster competition in the public safety equipment and services market,” which will lead to the development of new applications and solutions to address public safety’s needs.¹⁴

The High Tech DTV Coalition, which includes Cisco as well as a number of other leading-edge technology companies including Alcatel-Lucent, Dell, Intel, Microsoft, Qualcomm, and Texas Instruments, confirms the importance of applying commercial “off-the-shelf” communications solutions to public safety’s problems. The DTV Coalition noted:

“Public safety use of commercially developed technology available in the marketplace, based on standards supported by large ecosystems of vendors, will drive down costs through economies of scale; speed deployment by leveraging commercial research and development (R&D) efforts; improve spectral efficiency, making more bandwidth available to a greater number of users; and increase public safety access to the most advanced communications applications available.”¹⁵

¹³ *Cisco Comments* at 3.

¹⁴ *Id.*

¹⁵ *DTV Coalition Comments* at 10.

The DTV Coalition also noted that the use of commercial assets already deployed, such as radio towers and backhaul facilities, could yield significant cost savings and help to expedite deployment of a broadband network. Clearly, infrastructure sharing arrangements and other public-private partnerships can go a long way to promoting a more expeditious and cost effective implementation of broadband public safety networks. MSHP noted that, coupled with the promise of these kinds of public-private partnerships, the introduction of a national licensee “can allow public safety to perhaps more quickly adapt and utilize technological advancements to deploy the applications necessary for public safety entities to complete their mission.”¹⁶

Verizon Wireless commends the Commission for its innovative and timely proposal to maximize the efficient use of public safety spectrum to meet the important broadband communications needs of first responders. The comments filed in response to the *Ninth NPRM* demonstrate that a national framework for addressing these issues will yield substantial benefits for the public safety community, and provide the best opportunity to deploy a nationwide, interoperable broadband network for public safety’s use. These benefits will be greatly enhanced by rules that encourage public safety to take full advantage of the technological advances fueled by commercial wireless service and the substantial cost savings and accelerated deployment that can result from the sharing of commercial wireless infrastructure and technology.

¹⁶ *MSHP Comments* at ix.

Verizon Wireless urges the Commission to move expeditiously to implement its plan by adopting its proposal to allocate 12 MHz of the 700 MHz public safety spectrum to broadband use, assign this spectrum nationwide to a single, national public safety broadband licensee, and establish rules to promote the use of commercial technologies in the construction of a dedicated public safety broadband network.

Respectfully submitted,

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