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MAR 12 2007

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Federal Communications Commission  
Office of the Secretary

March 12, 2007

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th St., SW  
Washington, DC 20554

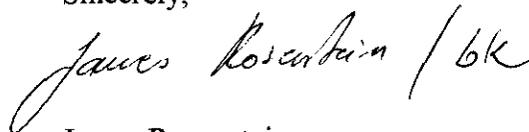
*Re: In the Matter of Implementing a Nationwide, Broadband,  
Interoperable Public Safety Network in the 700 MHz Band, (PS Docket  
No. 06-229), Development of Operational, Technical and Spectrum  
Requirements for Meeting Federal, State and Local Public Safety  
Communications Requirements Through the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

Dear Ms. Dortch:

Please find attached for filing in the above-reference proceedings the Reply Comments of Ygomi LLC. These Reply Comments were timely-filed in WT Docket No. 96-86 PS and Docket No. 06-229 on March 12, 2007.

Please direct any questions concerning this matter to the undersigned.

Sincerely,



James Rosenstein  
Sr. Vice President, External Affairs  
Ygomi LLC  
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Attachments

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

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In the Matter of )  
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700 MHz Band )  
)  
Development of Operational, Technical, and ) WT Docket No. 96-86  
Spectrum Requirements for Meeting Federal, )  
State and Local Public Safety Communications )  
Requirements Through the Year 2010 )

To: The Commission

**REPLY COMMENTS OF YGOMI LLC**

Ygomi LLC (hereinafter "Ygomi")<sup>1</sup>, hereby respectfully submits reply comments in response to the Ninth Notice of Proposed Rulemaking, FCC 06-181, released December 20, 2006 ("Ninth NPRM")<sup>2</sup> in the above captioned proceedings.

**I. INTRODUCTION**

Ygomi commends the Federal Communications Commission's (Commission) efforts to address the public safety needs for reliable communications services through this and prior rulemaking proceedings, that seeks to

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<sup>1</sup> Ygomi LLC builds and operates companies that deliver innovative software and services for essential business needs. Ygomi currently operates four information and communications technology companies which develop and commercialize leading-edge solutions in areas including wireless signal processing software, vehicle telematics, technical support for multi-location enterprises and consumer applications using distributed call centers. Headquartered in Oak Brook, Illinois. Ygomi and its companies: SEI, Verety, Connexis, and ArrayComm serve leading corporations around the world, with more than 1,100 employees across the U.S., Europe, and Asia.

<sup>2</sup> See *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), 72 Fed. Reg. 1201 (Jan. 10, 2007) ("Ninth NPRM").

facilitate the development and deployment of a nationwide interoperable broadband network for public safety use. Ygomi specifically applauds the *Ninth NPRM* because it takes another step forward towards realizing the true benefits of interoperability and expands its proposal to foster new technologies and improve emergency responsiveness. While the *Ninth NPRM* seeks comment on several proposals worthy of public debate, Ygomi limits its response to addressing the need for vehicle safety communications in the 700 MHz band to enhance public safety capabilities in rural and underserved areas of the country.

## **II. THE COMMISSION SHOULD ENSURE THAT THE PUBLIC SAFETY COMMUNICATIONS NETWORK SUPPORTS THE NEEDS OF VEHICLE SAFETY COMMUNICATIONS.**

We agree with the Commission that it is imperative for broadband technologies to provide the public safety community with the benefits of integrated voice and high-speed data services that might facilitate such applications as video surveillance, real-time text messaging and the sharing of high-resolution digital images.<sup>3</sup> These applications could yield enormous real-time benefits to public safety entities in responding to a crisis or other emergency event. The demand for high-speed broadband communications, and in particular data, is real and grows every day as new technology improvements are made. For example, Ygomi is working with vehicle manufacturers to develop the next generation of in-vehicle safety communications technologies. These technologies will have the capability to transmit real-time data to warn drivers and public safety and other officials of dangerous road conditions. These warnings will save lives and enhance road

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<sup>3</sup> *Ninth NPRM* at ¶ 18.

safety. These and other advanced intelligent transportation systems (ITS) safety applications, now under development, will provide significant benefits to aid public safety officials.

We encourage the Commission to continue to consider and adopt forward-looking policies that promote long-term interoperable communications technologies that will advance all public safety communications systems. For instance, use of the 700 MHz band for vehicle safety communications in rural and underdeveloped areas of the country could significantly reduce the number of vehicle crashes; improve notification time when crashes occur; and provide valuable data to public safety officials.<sup>4</sup> Discussions are underway in ITS standards bodies around the world to address (1) the long-term spectrum needs for broadband radio communications for ITS in, among others, the 5.9 GHz band, as well as harmonized spectrum in the 700 MHz band and (2) the development of software-reconfigurable radios and other “smart” technologies that will make more efficient use of the spectrum, avoid interference, and address obsolescence problems resulting from advancing technologies for vehicle safety for decades to come.<sup>5</sup> We urge the FCC to encourage the availability of vehicle safety communications that will further enhance the capabilities of our nation’s public safety responders.

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<sup>4</sup> Approximately 60 percent of all U.S. motor vehicle fatalities occurred on rural roads. *See Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users Highway Risk Rural Roads Fact Sheet, Federal Highway Administration, Revised March 17, 2006, Printed July 18, 2006. <http://safety.fhwa.dot.gov/safetealu/factsheet1401hrrr.pdf>; see also Federal Highway Administration Safety Report, November 2000. [http://safety.fhwa.dot.gov/speed\\_manage/docs/speeding\\_rural.pdf](http://safety.fhwa.dot.gov/speed_manage/docs/speeding_rural.pdf)*

<sup>5</sup> The Global Standards Coordination (consisting of ITU, TTA and ATIS (U.S.), ETSI (Europe), CCSA (China), TTA (Korea), ARIB and TTC (Japan), ISACC (Canada), and ACIF (Australia)) created a taskforce in June 2006 to recommend spectrum approaches for vehicle safety communication outside urban areas (among other things).

It is important to note that the FCC has allocated spectrum at 5.9 GHz for ITS safety as a priority. The U.S. Department of Transportation is leading the effort to deploy vehicle safety communications in this band. This effort will lead to effective vehicle safety communications primarily in cities and along the interstate highways. Trials are already underway. There are, however, technical and geographical limitations with respect to the areas where 5.9 GHz can be effectively deployed. In areas where deploying 5.9 GHz beacons is not practical or economic (notably rural and remote areas), allowing the use of 700 MHz public safety spectrum for vehicle safety communications will enhance the efficient use of available spectrum in these areas. Vehicle safety communications will use 5.9 GHz in areas of heavy use such as cities and interstate highways.

### **III. CONCLUSION**

Ygomi LLC commends the FCC for its leadership in addressing the current and future need for adequate and interoperable public safety communications. The *Ninth NPRM* is an essential step forward toward promoting deployment of an interoperable public safety network using efficient technologies with the promise to serve all public safety needs. We are confident that if public safety entities use efficient and cost-effective technologies in their existing and future allocated spectrum, they will ensure that emergency and first responders have access to reliable and interoperable advanced communications. Further, by taking into account all aspects of advanced technologies, including those that will enhance vehicle safety communications in rural and underserved

areas of the country, public safety agencies will be more fully capable of meeting all their existing and future public safety communications needs.

Respectfully submitted,

Ygomi LLC

/s/ James Rosenstein

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March 12, 2007

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