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April 4, 2007

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 - 12<sup>th</sup> Street, SW, Room TW-A325  
Washington, DC 20554

**Re: *Ex Parte* Presentation  
PS Docket No. 06-229 – “Public Safety 9<sup>th</sup> NPRM”**

Dear Ms. Dortch:

Verizon Wireless has been working with the Southern Governors Association (“SGA”) in conjunction with its recently established Task Force on “Achieving Interoperability for Public Safety Communications” (“Task Force”). The Task Force is addressing many of the same issues being addressed by the Commission in its Ninth Notice of Proposed Rule Making (“9<sup>th</sup> NPRM”). Specifically, the SGA is looking at various options for providing first responders with access to broadband applications, including through the possible construction of a broadband network in the 700 MHz spectrum allocated to public safety. Given the common issues raised in these two proceedings, Verizon Wireless would like its submissions to the SGA to be included in the Commission’s record for the 9<sup>th</sup> NPRM (PS Docket No. 06-229).

On March 2, 2007, the SGA announced the formation of its Task Force, and sought recommendations from interested parties on ways to achieve interoperability for public safety communications and provide public safety with access to broadband capabilities. Verizon Wireless filed comments with the SGA on March 16, 2007 and replies on March 23, 2007. Copies of these filings are attached.

In its submissions to the SGA, Verizon Wireless provided its views on how to achieve interoperability for public safety communications, including how IP-based technologies can be used to make existing incompatible radio systems interoperable without significant investment in new equipment or more spectrum. With regard to broadband capabilities, Verizon Wireless demonstrated how a dedicated public safety broadband network could be built on 10 MHz of

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spectrum in the 700 MHz band that Congress has allocated for public safety's use. Consistent with the principles proposed by the Commission in the 9<sup>th</sup> NPRM, the network we used for evaluation purposes would use commercial "off-the-shelf" CDMA EV-DO technology and would leverage existing commercial infrastructure to reduce costs. While we believe that such a network would meet public safety's normal day-to-day needs, we also proposed that first responders using this network would have priority access to commercial networks during emergencies.

The information provided in these filings provides additional detail regarding our assessment of the benefits of sharing commercial infrastructure. As we noted in our previous submissions to the Commission, the cost of constructing, operating, and maintaining a public safety broadband network can be substantially reduced if commercial towers, backhaul facilities and other commercial infrastructure are made available for public safety's use.

Pursuant to Section 1.1206(b)(2) of the Commission's Rules, an electronic copy of this letter is being filed for inclusion in the above-referenced docket.

Respectfully submitted,

VERIZON WIRELESS

By: /s/ John T. Scott, III \_\_\_\_\_  
John T. Scott, III  
Vice President and Deputy  
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Donald C. Brittingham  
Director – Wireless / Spectrum Policy

Attachment

cc: Erika Olsen  
John Branscome  
Bruce Gottlieb  
Barry Ohlson  
Aaron Goldberger  
Angela Giancarlo  
Ken Moran  
Fred Campbell

Jeff Cohen  
Dana Shaffer  
Jim Schlichting  
Cathleen Massey  
Julius Knapp