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April 20,2007

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

Re: Response to NPSTC
WT Docket Nos. 96-86, 06-150; PS Docket No. 06-229

Dear Ms. Dortch:

The National Public Safety Telecommunications Council ("NPSTC") recently filed in this proceeding a set of principles to guide the Commission's decisionmaking as it addresses the numerous issues pending in these dockets.[1] The Plan submitted by Frontline Wireless LLC ("Frontline") is in line with these principles and Frontline agrees with NPSTC that the FCC should seek to fulfill these principles as it adopts a band plan and service rules to ensure that public safety's needs are met.

Importantly, NPSTC recognizes there is a clear need for a nationwide, interoperable public safety network. Frontline's Plan is designed to meet this critical need by a privately-funded buildout of a nationwide, interoperable public safety network. Further, NPSTC states that adequate funding and a "serious commitment" will be integral to a successful buildout of the public safety network. We agree. Frontline's Plan provides for adequate private funding and an aggressive build-out schedule that demonstrates the serious commitment necessary to satisfy public safety's needs.

In addition, Frontline agrees with NPSTC that public safety must meaningfully participate in administering the nationwide public safety network and that public safety should maintain ultimate control over its spectrum. Under Frontline's Plan such participation would be essential to the success of both the buildout and operation of the public/private network, and the national public safety licensee would retain full control over its 24 MHz of spectrum. Public safety's needs will evolve over time, and the Commission's rules should have sufficient flexibility so that public safety can take advantage of the public-private partnership proposed in the *Ninth NPRM* and subsumed in the Frontline Plan.

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[1] *See* National Public Safety Telecommunications Council ***Ex Parte Presentation***, WT Docket Nos. 06-150, 96-86, and 06-169, PS Docket No. 06-229 (April 17,2007).

Frontline's Plan most effectively incorporates the conditions set forth by NPSTC as crucial to the improvement of public safety's communications.

Sincerely,

Gerard J. Waldron

Counsel to Frontline Wireless