



June 1, 2007

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: WT Docket No. 06-150
CC Docket No. 94-102
WT Docket No. 01-309
WT Docket No. 03-264
WT Docket No. 06-169
PS Docket No. 06-229
WT Docket No. 96-86

Dear Ms. Dortch:

Pursuant to Section 1.1206(b)(2) of the Commission's Rules, this is to notify you that on May 31, 2007, Stu Overby, Tony Marshall and the undersigned, with Motorola, met with Derek Poarch, Tim Peterson, David Furth, Dana Shaffer and Jeff Cohen of the Public Safety & Homeland Security Bureau regarding the above captioned proceedings.

During the meeting we discussed the attached presentation related to services for public safety.

Pursuant to the Commission's Rules, one copy of this notice is being filed electronically with the Commission. If you require any additional information please contact the undersigned at (202) 371-6953.

Sincerely,

/s/ Steve B. Sharkey

Steve B. Sharkey, Director
Director, Spectrum and Standards Strategy

cc: Derek Poarch
Tim Peterson
David Furth
Dana Shaffer
Jeff Cohen

Attachment



A National Framework for Public Safety Data

May 2007

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Public Safety Remains Committed to Meeting Local Needs

Overwhelming Public Safety support for local/regional flexibility to choose solution on at least a portion of the 700 MHz PS data spectrum

63 Public Safety entities support flexibility *

- Not a single entity supports broadband network only
- 18 Regional Planning Committees represented
- 9 States & Statewide Interop Exec Committees represented
- 10 cities – representing large (NYC, Philadelphia, San Francisco) to small
- 19 counties - representing major metro to rural
- 10 districts/regional systems/others

7 Association filings, representing 25 public safety & local government associations, support flexibility

* Total greater than 63 due to some multiple agency filings

Meeting Local Needs Is Consistent with a Nationwide Framework

PS NB 3	PS WB 6	PS NB 3
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Current Band Plan

NW PS BB 5	G B 1	PS NB 3	PS NB 3
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FNPRM Proposal

- No flexibility
- Assumes rapid and successful nationwide BB deployment
- Potential to strand local public safety agencies

NW PS BB 3.75	RPC PS 2.25	PS NB 3	PS NB 3
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NPSTC Proposal

- Achieves nationwide BB goal while accommodating local requirements

- Minimum of 3.75 MHz dedicated to nationwide Broadband Network
- Licensed to and managed by National Public Safety Licensee
- Any carrier access is secondary to PS
- Non-PS use subject to absolute preemption

- 1.25 MHz channel reserved for Regional BB and up to 2.25 MHz for regional WB but implemented with and licensed by national PS Licensee in coordination with RPCs. Regions must make decision to use it by date certain or it reverts to NW BB
- Regional option to implement BB, WB or geographic mix of BB and WB
- RPC recommends location & amount of guardband, which will vary somewhat depending on deployment scenarios.
- WB systems will cease as of a date certain (2019) if NW BB operating and substantially serving same geographic area

NPSTC Plan Provides a Way Forward

The NPSTC Plan:

- **Encompasses a nationwide framework**
- **Recognizes the realities of implementation**
- **Allows regions to elect options on portion of the spectrum**
 - Local Wideband System
 - Local Broadband System
 - Include Spectrum in Nationwide Broadband Network

Key Elements for Implementation:

- **Provide RPCs, State and Local PS agencies sufficient time to make informed election**
- **Add capacity requirement into sunset benchmark**
 - Local election remains primary until later of:
 - 1) **Feb. 2019; or**
 - 2) **When nationwide network is operating and substantially serving same geographic area, and needs the additional spectrum to meet capacity requirements for public safety in that area**
- **Five-year construction requirement appears unnecessary given 2019 benchmark**
- **Exact location and size of internal guardband determined by public safety**
 - Provides most efficient use of the spectrum
- **Public Safety must remain in control of spectrum and public safety license**

Flexibility Should be Provided to Allow Wideband

Wideband Data Enables Large Coverage Areas with Fewer Sites.

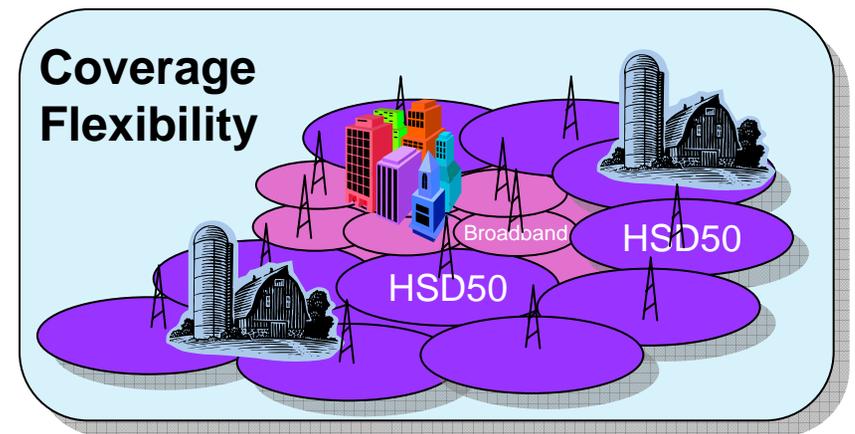
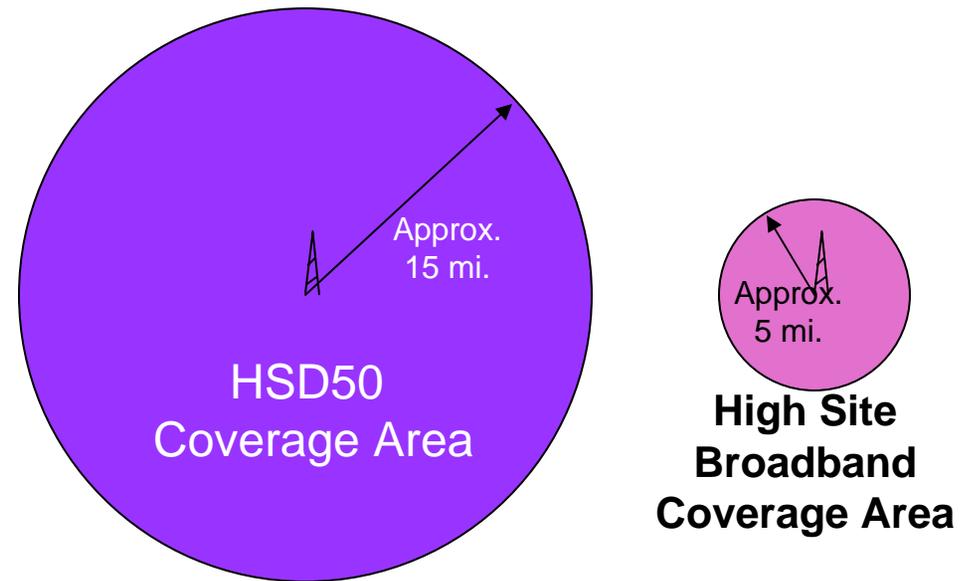
- Covers 700 sq. mi vs. 80 sq. mi for High Site Broadband
- Broadband not as effective for large area coverage when return link is considered

Equivalent Wideband Coverage Leverages Existing Investment.

- Add Data Equipment to an Existing Site vs. Building New Sites.
- Building New Sites Can Cost as Much as \$1M per Site.
- WB can also reuse switch from newer P25 systems

Extremely Cost Effective for Covering Large Rural Areas.

Device Cost Driven by Features – Not Underlying Technology



Technology Choice will Facilitate Operability – Not Impede Interoperability

Cost-Effective Wideband Allows Deployment in Areas Where Broadband May not be Economically Feasible

- Operability in unserved areas

Wideband Equipment Should Support Broadband Interoperability Standard When it is Selected

- Requirement eliminates concern regarding interoperability

Wideband Can Provide Bridge for Broadband

- Mobile with interface can serve as extension for broadband portables where no broadband infrastructure yet deployed

Conclusion

Public Safety has put forward the framework for an approach that:

- **Provides for nationwide broadband, and**
- **Meets the documented need for local control and input**

Providing technology choice allows the most effective implementation option for public safety

- **Cost effective coverage**
- **No negative impact for interoperability**

The Commission should not arbitrarily limit Public Safety to a yet to be proven model