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June 1, 2007

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VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

RE: In the Matter of
Public Safety Network in the 700 MHz Broadband
PS Docket No. 06-229 / RM-11348
WT Docket Nos. 06-150, 06-169 and 96-86
Ex Parte Presentation

Dear Ms. Dortch:

On behalf of Cyren Call Communications Corporation ("Cyren Call"), and in accordance with Section 1.1206(b) of the Commission's Rules, 47 C.F.R. § 1.1206(b), undersigned counsel hereby submits the instant notice of an *ex parte* presentation.

On May 31, 2007, the following representatives of Cyren Call: Morgan O'Brien, Chairman of the Board; Keith Kaczmarek – President; Tom Sidman, Executive Vice President – Business Processes; and Bruce Cox, Vice President - Government Affairs met with Commissioner Jonathan S. Adelstein and Barry Ohlson - Senior Legal Advisor to Commissioner Adelstein, Legal Advisor for Spectrum & International Issues.

The topics of the meeting included 700 MHz issues raised in PS Docket No. 06-229, RM-11348, and WT Docket Nos. 06-150, 06-169 and 96-86 and Cyren Call's positions on those issues as described in its filings in those proceedings. Also included in the discussion were matters raised regarding the recent Further Notice of Proposed Rulemaking in the 700 MHz Consolidated Order (FCC 07-72). Additionally, Cyren Call presented the attached Power Point presentation.

Kindly refer any questions or correspondence regarding this matter to the undersigned.

Very truly yours,

/s/

Elizabeth R. Sachs
Counsel to Cyren Call
Communications Corporation

Marlene H. Dortch, Secretary
June 1, 2007
Page 2

Enclosure

cc: Commissioner Jonathan S. Adelstein
Barry Ohlson, Esq.

A horizontal graphic of the United States flag, showing the stars and stripes, positioned across the middle of the slide. The top and bottom corners of the slide are solid blue.

***Public Safety Nationwide Wireless
Broadband Network***

Agenda

- **NPSTC Proposal for Creation of the Public Safety Spectrum Trust (PSST)**
- **Spectrum Shortfall Threatens Network Economics**
- **Elements of Local Control in a Nationwide Network**
- **Accelerating the Buildout: Responding to Local Concern**
- **Band Plan**

Public Safety Spectrum Trust (PSST)

- In the 9th FNPR comments, NPSTC indicated a non-profit “Public Safety Spectrum Trust Corporation” will be formed to hold a National Public Safety License and promote: (1) universal access by all agencies, (2) a modern network meeting emergency response standards, (3) local participation, and (4) a public safety governing structure.
- The PSST will be managed by a Board of Directors comprised of representatives from AASHTO, APCO, FCCA, IACP, IAFC, IMSA, NASEMSO, NSA and one at large member selected by the Board.
- The Board will be responsible for adopting rules and by-laws..
- An advisory committee serving the Board will be comprised of representatives consisting of public safety organizations reflecting experience and expertise in government safety and emergency services such as FOP, IAFF, NACo, MCC, MCSA, NENA, NGA, NLC, NVFC, USCOM, MFCA and others.

Network Economic Highlights (30 MHz)

- **37,000 cell sites**
 - 99.3% U.S. population
 - 63.5% landmass covered (including AK, HI, PR)
- **~\$18 billion cumulative capital expenditures; 30% of total CapEx specific to Public Safety**
 - Additional cell sites to meet Public Safety coverage requirements
 - Hardened cell sites
 - Dedicated network operating centers
 - Satellite and interoperability gateways
 - Specialized billing and care systems
 - Research & development for advanced equipment and applications
- **35 million subscribers**
 - 11% blended average penetration rate of 335 million total U.S. population (2018)
 - Public Safety: 67% penetration rate of 2.9 million people
 - Critical Infrastructure: 55% penetration rate of 11 million people
 - Commercial: 8% penetration rate of 321 million people; 24% of 111 million employed people

Spectrum Impact on Network Economics

(0) Base Case

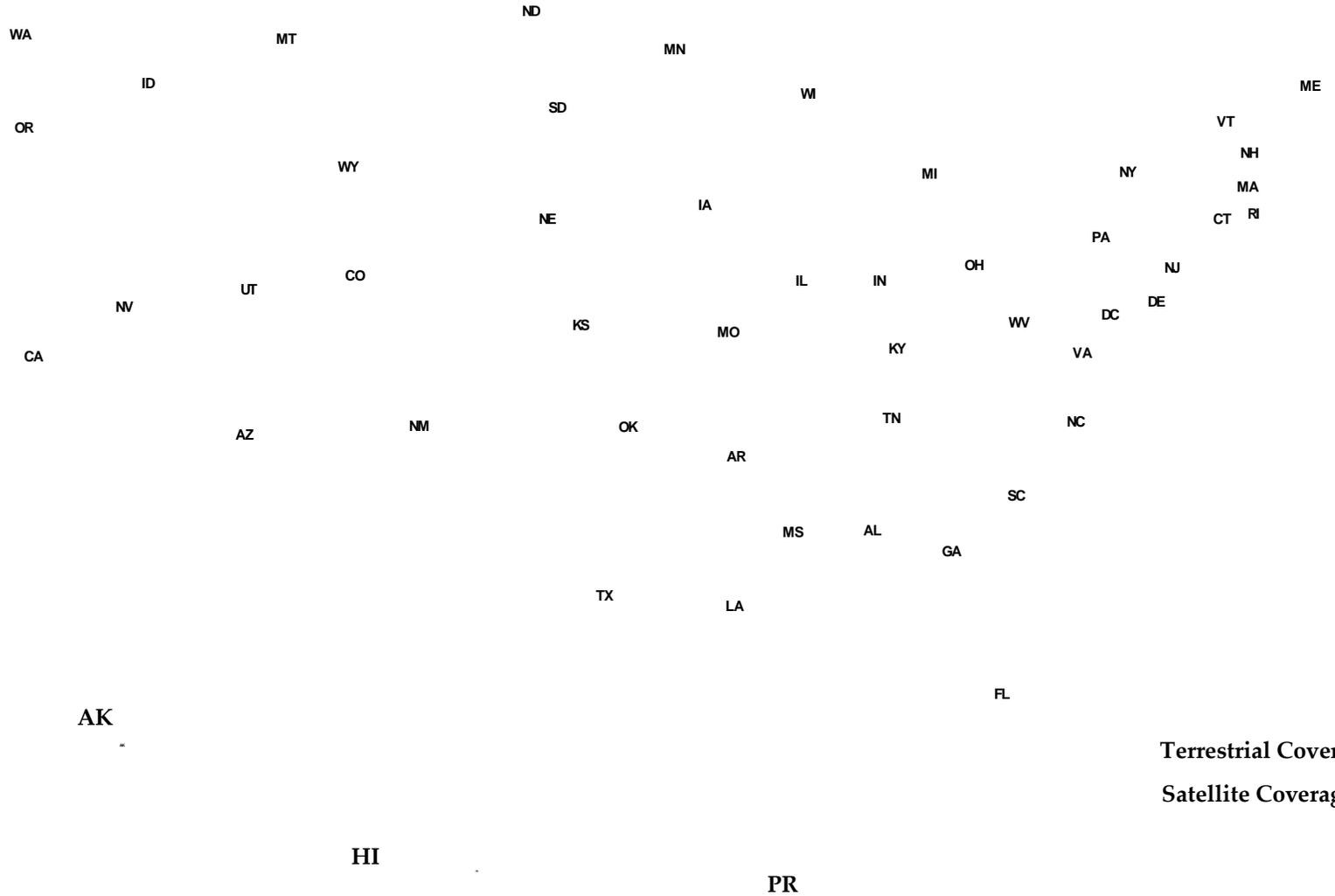
Spectrum Position Scenarios (PS contributes 10 MHz usable spectrum, balance acquired through auction or acquisition)

- (I) Maintain urban capacity, lose rural coverage**
- (II) Maintain urban capacity, lose rural coverage**
- (III) Maintain urban capacity, maintain rural coverage**

	(0)	(I)	(II)	(III)
	Base 30 MHz	24 MHz	20 MHz	20 MHz
Total Sites	37.0K	37.0K	37.0K	41.4
Total Rural Sites	16.8K	14.8K	12.4K	16.8K
Population Covered	99.3%	98.9%	97.9%	99.3%
Geography Covered	63.5%	57.3%	50.0%	63.5%
CONUS Covered Geography	75.0%	67.8%	59%	75.0%
Population Density Threshold	≥ 5	≥ 8	≥ 14	≥ 5

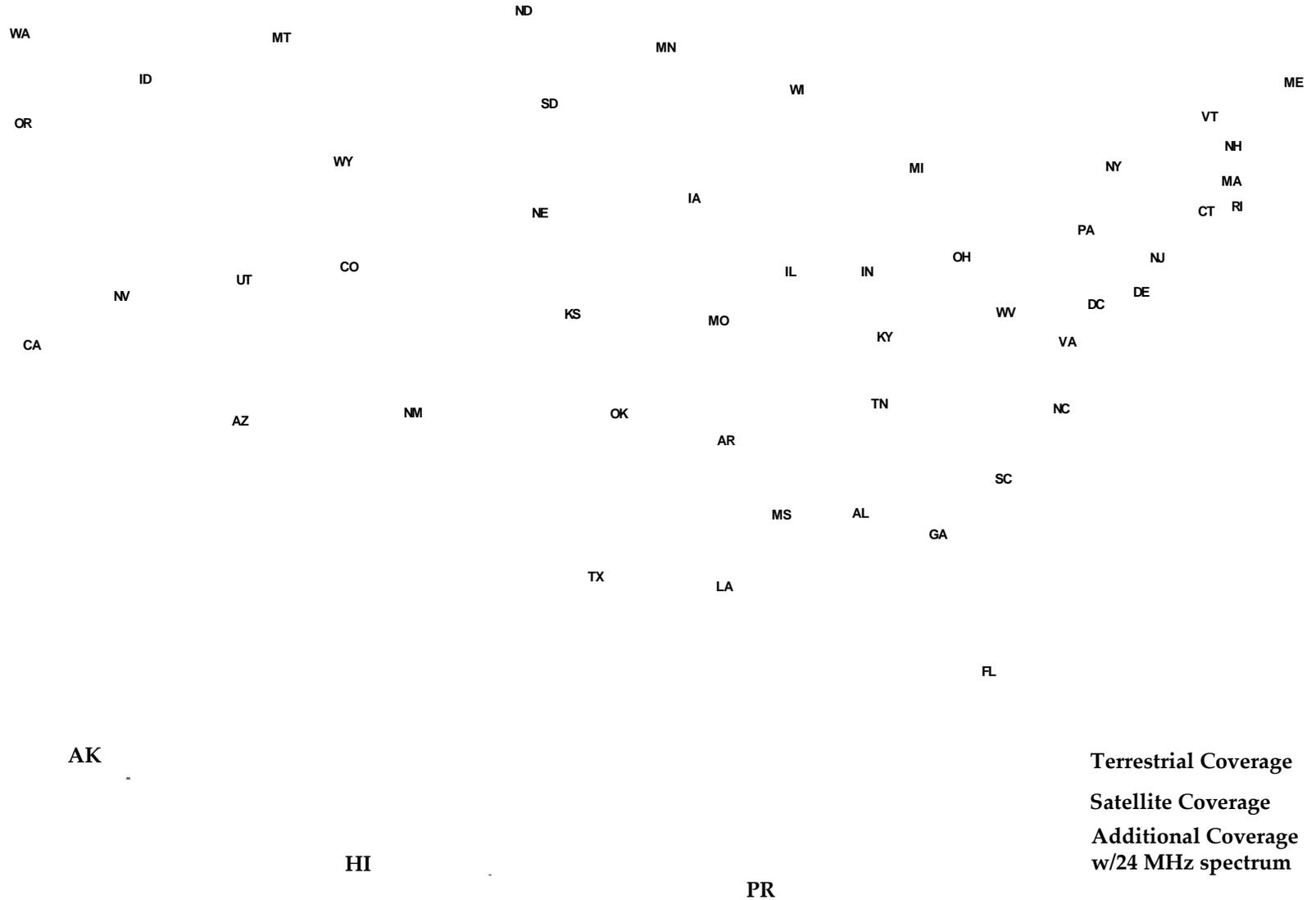
20 MHz Allocation – Network Coverage

37K Cell Sites



Terrestrial Coverage
Satellite Coverage

24 MHz Allocation – Additional Network Coverage Gains vs 20 MHz 37K Cell Sites



Local Public Safety Control

■ Local Public Safety will still control:

- Creation of virtual networks for their individual jurisdictions**
- Access classes/ Priority Access for their users**
- Talk/User groups definition and control**
- Device and application selection**
- Network availability and performance monitoring of partner network**
- Through the creation of the PSST User Group**
 - Input into the feature and requirement development roadmaps**
 - Input into coverage requirements and enhancement schedules**

Accelerating the Build: Responding to Local Concern

■ **Cyren Call proposed process**

- **Broadband technology decision must be made at a national level**
- **Must balance needs of local interests in terms of deployment timing**
 - **If agency or jurisdiction has sufficient committed funds and a timetable for building a broadband network, they first contact the National Licensee (PSST) to determine timing of nationwide network in their location.**
 - **If nationwide network meets their timeline, they do not build their own and spend the funds on devices, applications etc.**
 - **If nationwide network does not meet their timeline, then the local jurisdiction should be free to proceed with their broadband plans upon a showing to the PSST that its system will be compatible with and ultimately integrated into the nationwide network.**

■ **Wideband: if necessary, locate in narrowband**

Proposed 700 MHz Band Plan



- **Based on FCC Band Plan #4 with a few modifications:**

- C and D Blocks change from 5.5 MHz \Rightarrow 5 MHz
- E Block changes from 5 MHz \Rightarrow 6 MHz
- Move A Block between D and E Blocks

- **E Block winner required to build a shared public/private network supporting Public Safety**

- **E Block winner has access to a minimum of 22 MHz and possibly 24 MHz (through acquisition of A Block license) of spectrum to construct a public/private broadband network to serve Public Safety**

- **May make the E block and Public Safety/Private shared broadband band more attractive to carriers seeking a large national footprint with the largest available combination block of 22/24 MHz**

- **Keeps Public Safety spectrum allocation at 24 MHz**

- **Solution for Canadian border Public Safety narrowband interference issue**

- **A Block placement benefits**

- Allows either the D or E Block licensees to bid to acquire the A Block

- **Potential for Commercial Only 11x11 MHz block (C+D+A Blocks)**