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15 June 2007

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Former Nextel Communications, Inc. Upper 700 MHz Guard Band Licenses and Revisions to Part 27 of the Commission's Rules, WT Docket No. 06-169; The Development of Operational Technical and Spectrum Requirements for Meeting Federal, State and Local Public Safety Communication Requirements Through the Year 2010, WT Docket No. 96-86.

Dear Ms. Dortch:

On 14 June 2007, Cindy Christy, President Alcatel-Lucent North America, John Marinho, Vice President Global Government and Public Affairs, Robert LeGrande, Deputy Chief Technology Officer, District of Columbia, Andrew Smith, LGS, and the undersigned participated in separate meetings with Federal Communications Commission ("Commission") Chairman Kevin J. Martin, Commissioner Deborah T. Tate, Commissioner Jonathan S. Adelstein, Commissioner Robert M. McDowell and their respective wireless legal advisors. The purpose of the meeting was to discuss, reiterate and affirm Lucent's position in the above referenced proceedings.

Alcatel-Lucent reiterated its support for the need for a broadband-only 6 MHz broadband block in the 700 MHz public safety spectrum space. We contend that by permitting the operation of wideband technologies will only perpetuate the current shortcomings of today's public safety systems: limited, lower bandwidth applications, high cost of user devices, and limited interoperability. In the end, commercial broadband technologies are simply more capable and cost-effective than wideband technologies, as was demonstrated by the costs associated with the National Capital Region. In addition, if wideband is supported for rural coverage, it should be placed in public safety's internal guard band or in the public safety narrowband block.

Finally, the Commission should adopt a single commercial broadband technology as the nationwide interoperable standard, so that state and local jurisdictions can build regional networks, forming a "network of networks" in order to speed nationwide interoperability, *e.g.* National Capital Region. These regional networks would interoperate through roaming agreements with the national licensee and other regional public safety broadband networks, and possibly commercially deployed wireless operators using similar technology. This approach also

has the advantage of enabling extended coverage and redundancy capabilities through roaming agreements with existing commercial networks.

In accordance with Section 1.1206(b)(2) of the Commission's rules, this letter is being filed electronically with your office. Please contact the undersigned with any questions in connection with this filing.

Respectfully submitted,



Michael T. McMnamin

cc: Chairman Kevin J. Martin
Commissioner Deborah T. Tate
Commissioner Jonathan S. Adelstein
Commissioner Robert M. McDowell
Erika Olsen
Angela Giancarlo
Aaron Goldberger
Barry Ohlson