



June 29, 2007

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

Re: WT Docket 06-150, WT Docket 06-169
WT Docket 03-264, WT Docket 96-86
WT Docket 01-309, CC Docket 94-102
PS Docket 06-229

Dear Ms. Dortch:

On June 25, 2007 the National Public Safety Telecommunications Council (NPSTC) filed a letter in the above captioned proceedings providing a proposal for a streamlined mechanism for reconfiguring the 700 MHz Public Safety narrowband spectrum.¹ Motorola supports NPSTC's proposal and herein provides additional information regarding the estimated costs for completing the reconfiguration. Motorola provides this information based on the best information currently available and considering anticipated average costs. Actual costs will vary from system to system based on a variety of factors, and the process proposed by NPSTC provides an appropriate mechanism to reimburse licensees for their actual expenses.

The current band plan for the 700 MHz public safety spectrum separates the two three-megahertz paired narrowband blocks by a contiguous block of six megahertz paired spectrum currently identified for wideband technologies. Motorola supports the Commission's proposal to consolidate the public safety narrowband channels to the upper end of the public safety band.² Consolidating the narrowband blocks will reduce the need for internal guard bands that may be necessary depending on the type of data technology deployed and the deployment configuration, thereby providing additional flexibility to deploy the data technology most suitable to meet public safety requirements.

In its letter, NPSTC sets out three principles and four key milestones for completing the reconfiguration. The principles are, 1) Public Safety should not bear any of the cost of retuning, 2) Public Safety should not be forced to delay any of its narrowband retuning costs, and 3) The 700 MHz [reconfiguration] process should be streamlined and straightforward with no extraneous participation. Motorola supports these three important principles, along with the milestones and process proposed by

¹ Letter from Vincent R. Stile, Chair, National Public Safety Telecommunications Council to the Honorable Kevin Martin, Chairman, Federal Communications Commission, dated June 25, 2007.

² See Comments of Motorola, Inc., WT Docket 06-150, WT Docket 06-169, WT Docket 03-264, WT Docket 96-86, WT Docket 01-309, CC Docket 94-102, PS Docket 06-229 dated May 23rd at 7.



NPSTC, as providing the most expeditious and fair means to complete the reconfiguration while limiting the impact on the ongoing deployment of critical public safety communications systems.

Consolidating the narrowband blocks requires equipment that is currently deployed, or that will be deployed prior to the actual reconfiguration, and is operating on 700 MHz, to be reprogrammed to operate in accordance with the new bandplan. As noted in the NPSTC proposal, this includes infrastructure equipment, mobiles and portables, including mobiles/portables used as part of an overall system, as well as in the “talk-around” or vehicular repeater modes. While the process at 700 MHz is not as complex as that at 800 MHz, commencement of actual reconfiguration will still require a number of steps to be completed. NPSTC provides a process with four milestones for completing the necessary steps. The second milestone provides approximately one year after the Commission finalizes a new bandplan for concerned parties to complete the necessary tasks for reconfiguration, including reprogramming the CAPRAD database, updating state-wide and regional frequency plans, updating public safety licenses and developing and testing of revised code-plug programming software necessary to retune radios and systems to operate in accordance with the new plan. Motorola believes that it is feasible to complete development and testing of the code-plug programming software within the one-year time frame provided by NPSTC. We note that the estimated date for completion of July 31, 2008 is contingent on Commission adoption of a final bandplan by the end of July 2007 and that delay in a decision would necessarily result in a corresponding change of the one year completion date.

As proposed by NPSTC, narrowband systems deployed and operational by July 31, 2008 would qualify for reimbursement for retuning their systems, including bases, mobiles and portables NPSTC also notes that Access Spectrum and Pegasus have agreed to this process. Including systems operational by this date, which again is assumed to be approximately one year from the adoption of a Commission decision regarding the final bandplan, is an important component that will allow public safety entities to continue to deploy much needed communications systems without fear of incurring additional costs due to regulatory changes. The one year date provides time for development of the necessary code plug programming software needed to reprogram radios to operate under the new plan and changes to be made in the CAPRAD database, public safety licenses and state-wide and regional frequency plans. For systems deployed after the one-year benchmark, the new code plug programming software would be available for use from the outset of 700 MHz system deployment under the new bandplan, so there should be no incremental costs to fund for those systems.

In its comments, Motorola estimated that the costs associated with reprogramming installed 700 MHz equipment, including mobiles, portables and base stations actually operating at 700 MHz now or targeted to operate by the time the actual band reconfiguration begins approximately one year after the Commission finalizes the new bandplan, is in the range of \$10 million.³ Following are estimates of the Motorola system deployments that provide the basis of the cost estimate.

³ We note that this estimate is for equipment actually operating at 700 MHz now or by the time the actual reconfiguration begins in the field. This estimate does not include funding for the many radios deployed that are designed to be capable of operating at both 700 and 800 MHz but which have not been programmed to operate on 700 MHz channels or are not expected to be programmed to operate at 700 MHz by the time the actual reconfiguration begins.



Timing	Number of Systems	Number of portables	Number of mobiles	Number of transmit sites
Now	13	30,000	25,000	90
YE2007	18	33,700	27,400	252
July 2008	21	41,200	35,000	610

Using a reasonable estimated average cost of \$100 to reprogram each mobile and portable radio, and \$3,000 to make necessary changes at each base transmitter site location yields an estimated cost of \$9.45 million to reconfigure Motorola equipment deployed and operational through July 2008. This cost is necessarily an estimate based on the best information available to Motorola. However, information available about the extent of deployed equipment and the costs of retuning is imperfect and subject to change. Also, while we have used reasonable average costs for making necessary changes to each unit, the actual costs will vary depending on the region and unique circumstances of the licensees, particularly given regional variations in hourly rates for service technicians. This estimate is only for the costs to reconfigure Motorola equipment and does not include any management costs or other costs that licensees and the parties actually performing the reconfiguration may determine is appropriate and reasonable to include. The process proposed by NPSTC includes a census phase where information is gathered from the licensees and which will provide more precise information regarding the costs of reconfiguration.

Motorola believes that NPSTC has proposed a viable reconfiguration process that will allow reconfiguration to be completed in a timely manner while limiting any disruption to critical public safety communications. We urge the Commission to adopt NPSTC's process. Motorola is pleased to provide the above information to clarify the basis for our estimate of the anticipated costs of reconfiguration and



looks forward to working with all concerned parties to complete the reconfiguration as quickly and seamlessly as possible. Please contact the undersigned if you have any questions.

Sincerely,

/s/ Steve B. Sharkey

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