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July 19, 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 July 18, 2007, the following representatives of Cyren Call: Morgan O'Brien, Chairman of the Board; Bruce Cox, Vice President - Government Affairs; David Knutson, Vice President - Development; and Robert Burkhardt, Executive Director - Technology; as well as undersigned counsel, met with representatives of the Spectrum & Competition Policy Division ("SCPD"), Wireless Telecommunications Bureau ("WTB") and Public Safety & Homeland Security Bureau ("PSHSB") as follows:

SCPD, WTB: John Branscome, Chief; Paul D'Ari, Deputy Chief; Ben Freeman, Senior Analyst and Wayne Leighton, Senior Economist;

PSHSB: Jeff Cohen, Senior Legal Counsel.

The topic of the meeting was the attached Power Point presentation. The participants also discussed certain 700 MHz issues raised in PS Docket No. 06-229, RM-11348, and WT Docket Nos. 06-150, 06-169 and 96-86, including matters raised in the recent Further Notice of Proposed Rulemaking in the 700 MHz Consolidated Order (FCC 07-72), and Cyren Call's positions on those issues as described in its filings in those proceedings.

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

Very truly yours,

/s/

Elizabeth R. Sachs

Enclosure

cc: John Branscome
Paul D'Ari
Ben Freeman
Wayne Leighton
Jeff Cohen



Cyren Call Communications

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Agenda

- **Coverage Impacts of Federal Land Exclusion**
- **Public/Private Broadband Network Usage Modeling**

Federal Land Allocations by Agency or Department

Federal Agency	U.S. Land Mass		CONUS	
	<i>Federal Sq. Mi.</i>	<i>% of Total U.S. Land Mass</i>	<i>Federal Sq. Mi.</i>	<i>% of Total CONUS</i>
Dept. of Defense	43,019	1.22%	40,143	1.36%
Forestry Service	364,570	10.30%	327,414	11.06%
National Park Service	128,424	3.63%	43,711	1.48%
Fish and Wildlife Service	164,195	4.64%	21,607	0.73%
Bureau of Land Mgmt	420,239	11.87%	285,191	9.64%
Bureau of Reclamation	4,273	0.12%	4,273	0.14%
Tennessee Valley Authority	1,270	0.04%	1,270	0.04%
Other (CIA, DoE, BoPrisons, etc.)	3,913	0.11%	3,912	0.13%
Total All Federal	1,129,903	31.92%	727,521	24.58%

U.S. Land Mass - Federal Land Exclusion Impact

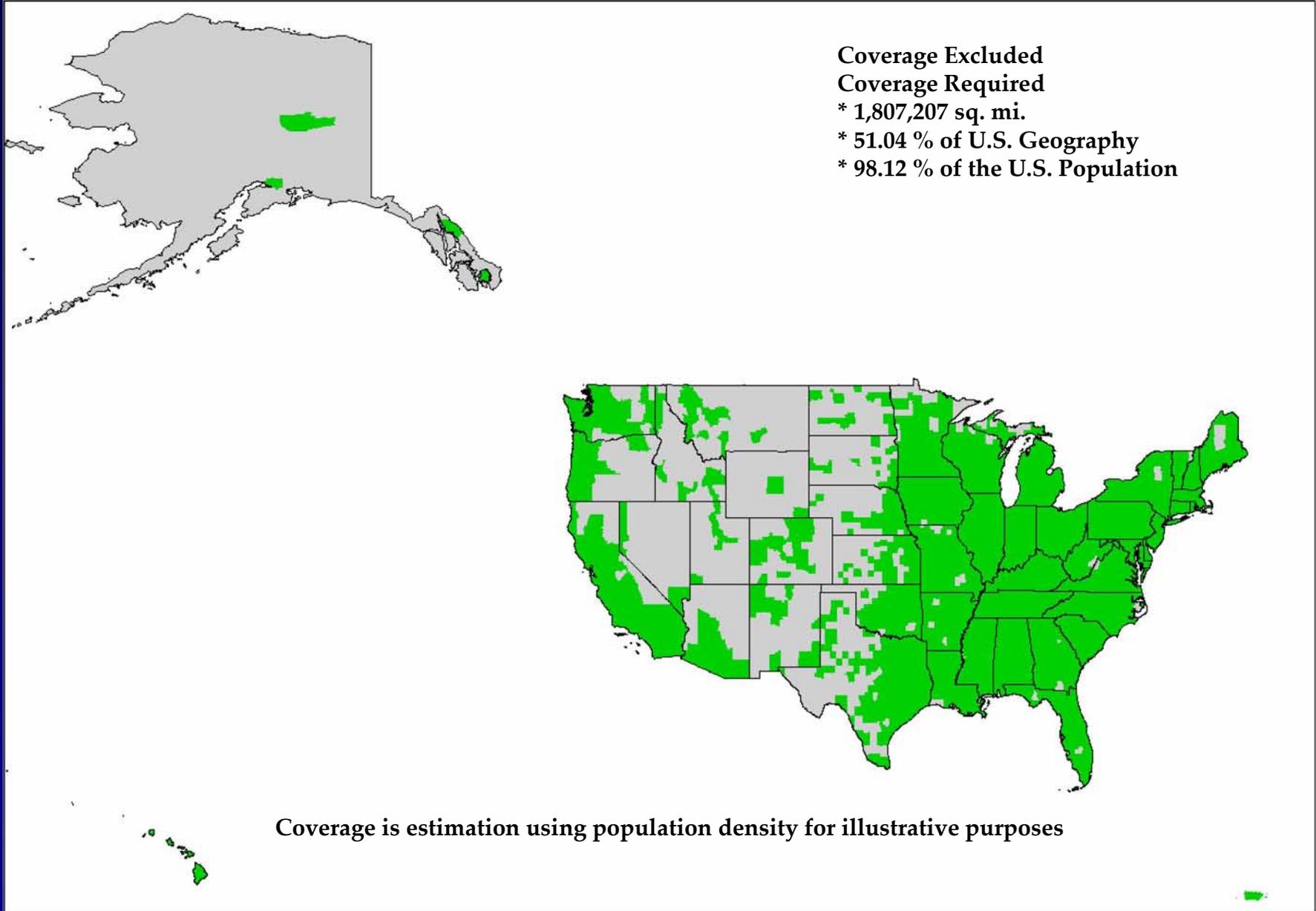
Calculation Basis

- | | |
|---|-------------------|
| A. Total U.S. land mass is: | 3,539,513 sq. mi. |
| B. Total U.S. Federal land is: | 1,129,903 sq. mi. |
| C. Remaining U.S. land to be covered is: | 2,409,610 sq. mi. |
| <i>(A-B = C)</i> | |
| • 75% of Non-Excluded U.S. land: | 1,807,207 sq. mi. |
| <i>(= C * .75)</i> | |
| • Under FNRPM Proposal: | |
| <i>- 1,807,207 sq. mi. = 51.04% of U.S. Land Mass</i> | |
| <i>= 98.12% of the total U.S. Population</i> | |

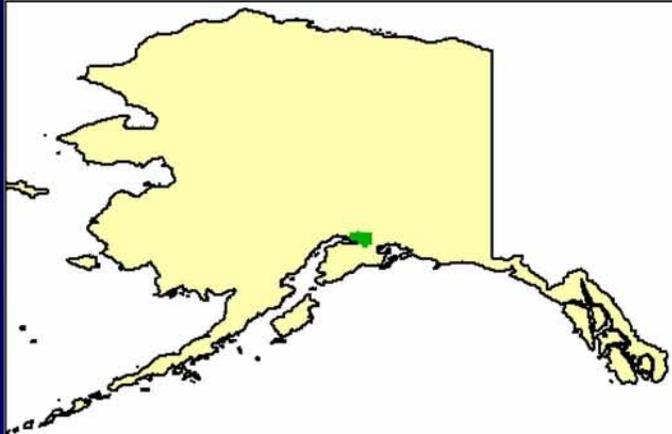
Note:

1. Results calculated via aggregation of highest to lowest population density areas that equals target 75% coverage requirement
2. Source: USGS – GIS Boundary and Geographic Data
3. Total Indian Lands = 101,140 Sq. Mi.

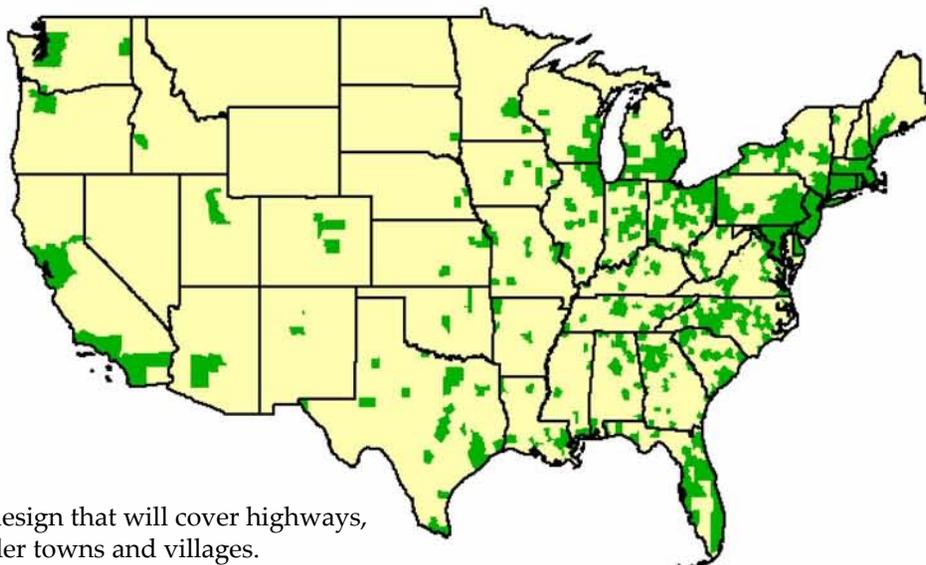
Coverage Based on 1,807,207 sq. mi.



= % of U.S. Population Coverage – Year 4 – High Level



Coverage For	U.S.	CONUS
Population =	75%	75%
Geography =	10.9%	13.2%

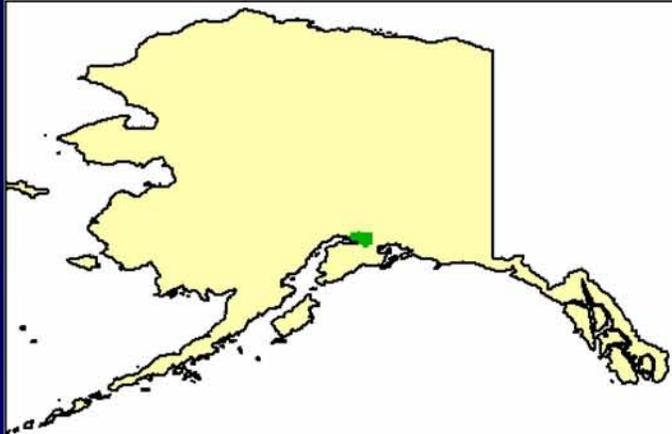


Note:

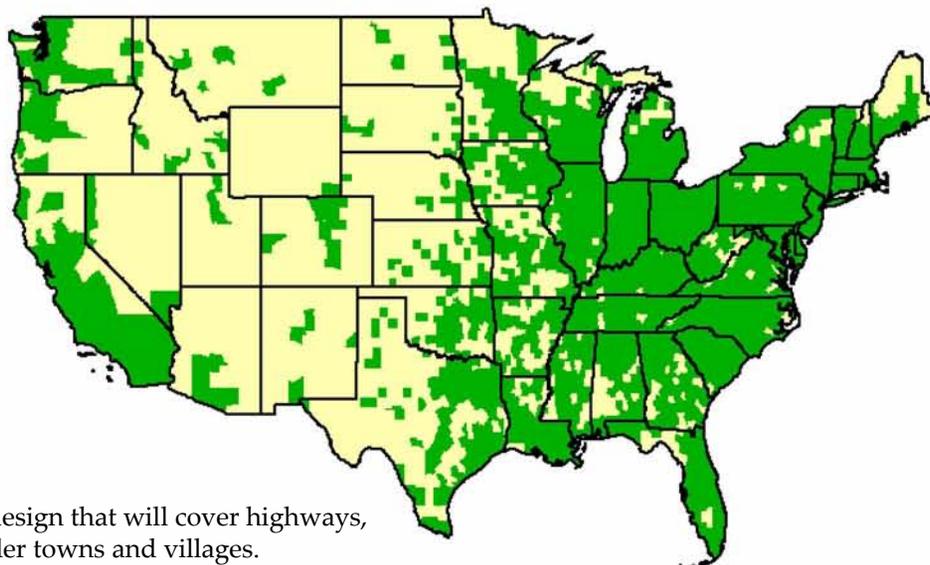
- Map does not reflect final RF design that will cover highways, identified rural area, and smaller towns and villages.
- Analysis was also based on county boundaries.
- Changing to smaller boundaries (e.g. Zip Code) will change the coverage



= % of U.S. Population Coverage – Year 7 – High Level



Coverage For	U.S.	CONUS
Population =	95%	95%
Geography =	37.7%	44.6%



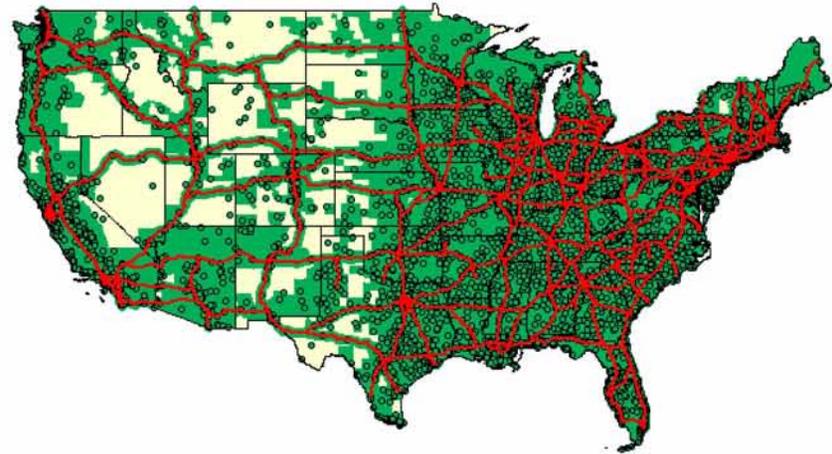
Note:

- Map does not reflect final RF design that will cover highways, identified rural area, and smaller towns and villages.
- Analysis was also based on county boundaries.
- Changing to smaller boundaries (e.g. Zip Code) will change the coverage



= % of Population Coverage – Year 10 – Cities / Hwys

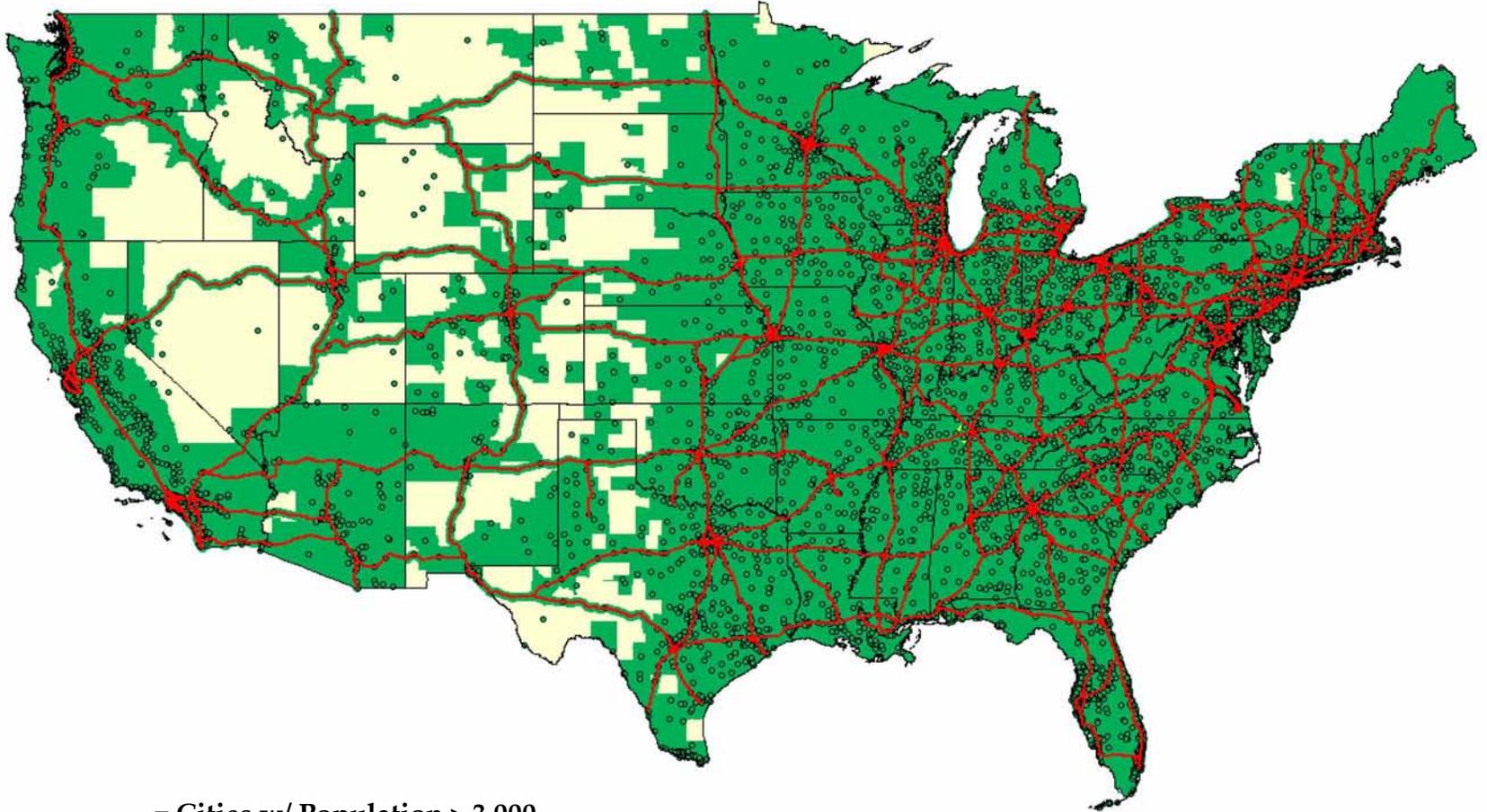
Coverage For	U.S.	CONUS
Population =	99.3%	99.3%
Geography =	63.0%	73.5%



= Cities w/ Population > 3,000
= Major Highways and Interstates

= % of Population Coverage –Year 10 - Cities / Hwy

Coverage For	U.S.	CONUS
Population =	99.3%	99.3%
Geography =	63.0%	73.5%



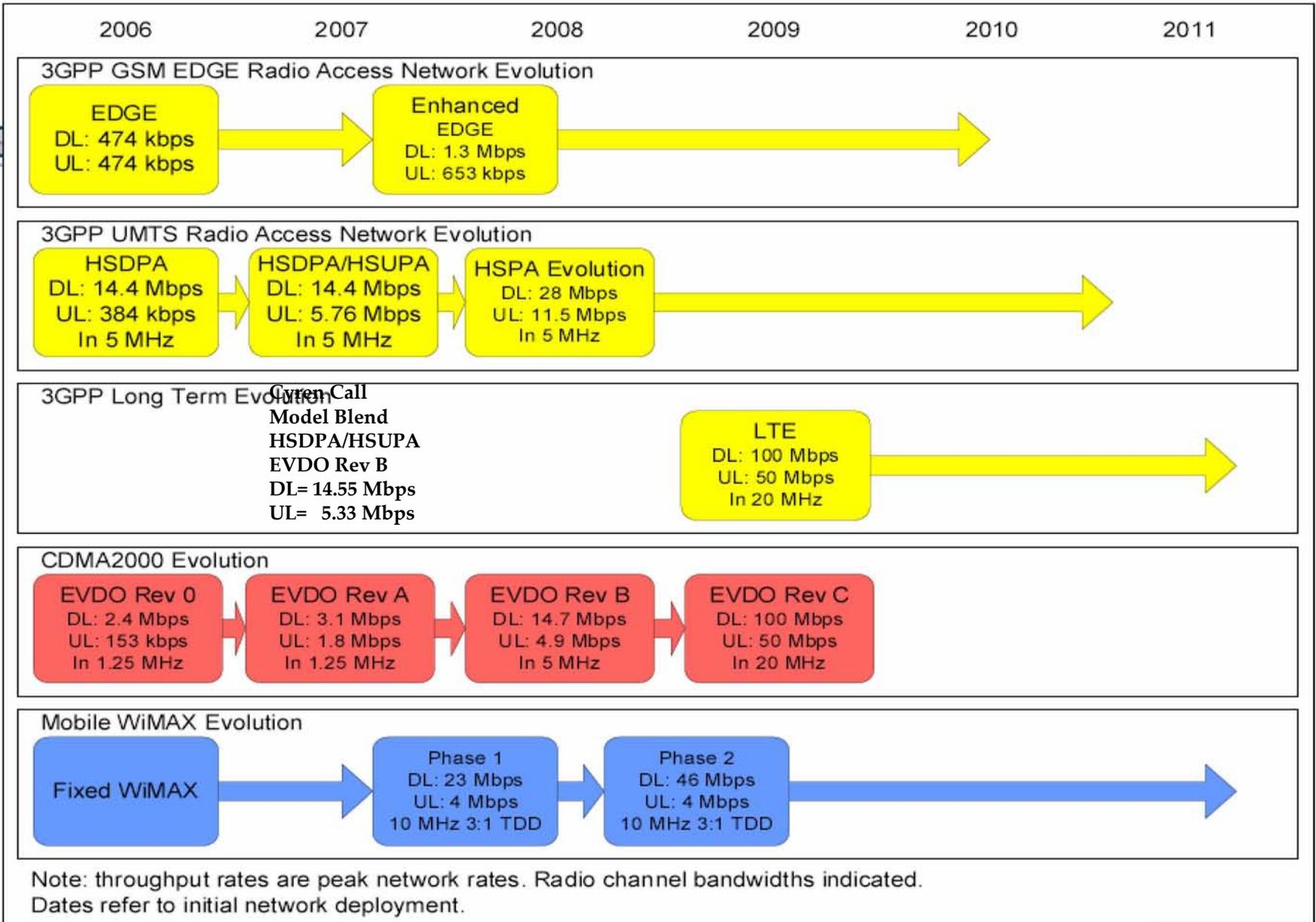
= Cities w/ Population > 3,000
= Major Highways and Interstates

Spectrum Modeling Network Data and Voice Usage

Year	Subscriber Type	2010	2011	2012	2013	2014	2015	2016	2017	2018
Per Subscriber Type [Per Month]										
Voice Minutes	Public Safety	1,648	1,697	1,748	1,801	1,855	1,910	1,968	2,027	2,088
	Critical Infrastructure	1,260	1,323	1,389	1,459	1,532	1,608	1,689	1,773	1,862
	Commerical Users	963	1,030	1,103	1,180	1,262	1,351	1,445	1,546	1,655
	Average Total Voice Minutes	1,062	1,149	1,219	1,284	1,355	1,434	1,519	1,613	1,715
Per Subscriber Type [Per Month]										
Data MB	Public Safety	2,100	2,205	2,315	2,431	2,553	2,680	2,814	2,955	3,103
	Critical Infrastructure	1,284	1,374	1,470	1,573	1,683	1,801	1,927	2,062	2,206
	Commerical Users	660	726	799	878	966	1,063	1,169	1,286	1,415
	Average Total Data MB	868	988	1,071	1,138	1,215	1,302	1,401	1,516	1,646
By Subscriber Type [Annual]										
Total Network Usage										
Voice Minutes (000)										
	Public Safety	157,486	1,560,380	7,354,105	12,137,889	15,736,306	18,090,916	19,968,579	21,783,014	23,730,978
	Critical Infrastructure	152,876	1,620,000	7,741,756	13,267,306	19,194,304	23,956,066	27,408,411	30,660,756	33,631,091
	Commerical Users	507,698	4,060,292	19,597,607	37,807,697	58,671,686	78,899,503	98,092,439	115,610,568	131,723,937
	Total Network Voice Minutes	818,060	7,240,672	34,693,468	63,212,893	93,602,295	120,946,484	145,469,429	168,054,339	189,086,006
Data MB										
	Public Safety	2,006,799	8,107,830	19,477,180	32,771,135	43,311,494	50,758,993	57,115,197	63,514,748	70,538,191
	Critical Infrastructure	3,115,766	13,458,413	32,770,487	57,229,594	84,373,244	107,310,537	125,113,797	142,625,992	159,423,103
	Commerical Users	6,959,098	22,886,208	56,780,405	112,611,979	179,656,046	248,368,459	317,443,632	384,625,017	450,519,508
	Total Data MB	12,081,664	44,452,450	109,028,072	202,612,708	307,340,784	406,437,989	499,672,626	590,765,757	680,480,803
Basis										
8 hr per day * 22 days per month = 176 hr or 10,560 minutes										
1,000 minutes = 16.7 hrs										
2,000 minutes = 33.3 hrs										

Note: Usage per user profile and projected user class population growth across 2010-2018

Cyren Call Model - Technology Capacity Assumptions



Assumed Network Services Parameters

Type	Category	Sub-Category [where applicable]	Capacity Mgmt Ref ID	Service Description	Example	Service Level Designator	RAN Service Rqmt		E-E / 1-Way Delay [ms]
							Throughput [Kbps]	Rate [Mbps]	
Voice	PS Tele-Services [P2S]	PTT	TSP-1	Individual-Direct	1:1 or Walkie Talkie	Guaranteed	24	0.024	<150
			TSP-2	Group	Talk Groups	Guaranteed	24	0.024	< 150
			TSP-3	Broadcast	1:N or 1:1 for Dispatch	Guaranteed	24	0.024	< 150
			TSP-4	Un-addressed Open Channel	1: All Devices on Channel All Devices on Channel	Guaranteed	24	0.024	< 150
	Monitoring	TSM-1	Individual-Direct	Unit Device level	Guaranteed	24	0.024	< 150	
		TSM-2	Group	All Units Device assigned to grp	Guaranteed	24	0.024	< 150	
		TSM-3	Channel	All Units Device on channel	Guaranteed	24	0.024	< 150	
		TSM-4	Scanning	All Units Devices on selected channels	Guaranteed	24	0.024	< 150	
	Alerting	TSA-1	Individual-Direct	Unit Device level	Guaranteed	24	0.024	< 150	
		TSA-2	Group	All Units Devices assigned to grp	Guaranteed	24	0.024	< 150	
		TSA-3	Audible Emergency	Individual device / assigned units to a group	Guaranteed	24	0.024	< 150	
		TSA-4	Silent Emergency	Unit Device level	Guaranteed	24	0.024	< 150	
	CMRS	Network Based	CMR-1	Local	Local M-M / M-PSDN	Predictive	18	0.018	< 150
			CMR-2	Long Distance	Long Distance M-M / M-PSDN	Predictive	18	0.018	< 150
			CMR-3	Conferencing	Voice	Predictive	18	0.018	< 150
			CMR-4	CLASS Features	Call Forward, Call Wait, Trace, etc	Predictive	18	0.018	< 150
CMR-5			Voice Mail	Traditional Voice Mail Services	Predictive	18	0.018	< 150	
Data	Media	Photo	DMP-1	Image Transfer	Stills, Slide Show	Best Effort	144	0.144	1000
	Messaging	SMS	DMT-1	Text	Both basic and enhanced (rich text) SMS	Best Effort	14.4	0.0144	4000
		E-Mail	DMT-2	Enhanced Text	Text w/attachments - various includes MMedia	Best Effort	14.4	0.0144	4000
	FTP	Bulk Data	DFT-1	Reporting	Form based data transfer	Best Effort	64	0.064	1000
			DFT-2	File Transfer	Various file type / sizes	Best Effort	64	0.064	2000
	Sensor	Telemetry	DSR-1	Bio-Metrics	Personal physiology reporting / mgmt	Guaranteed	28.8	0.0288	< 50
			DSR-2	Environmental	Temperature, Moisture, etc	Predictive	14.4	0.0144	4000
			DSR-3	Situational Awareness	Intrusion Detection, Wireless Fence, alarm	Guaranteed	28.8	0.0288	< 500
			DSR-4	Vehicle Telemetry	Vehicle Sensors - Speed, Crash, Engine, etc	Predictive	64	0.064	1000
	Location Based	Reporting	DLB-1	Person	Individual location tracking	Guaranteed	14.4	0.0144	< 250
		Reporting	DLB-2	Vehicle	Vehicle location tracking	Guaranteed	14.4	0.0144	1000
		Bulk Data	DLB-3	GIS Thematic	Thematic Maps (e.g. Hurricane Track, Flooding)	Best Effort	64	0.064	4000
		Reporting	DLB-4	Sensor	Location of Sensor both fixed and temporary	Best Effort	14.4	0.0144	4000
		Reporting	DLB-5	Robotic	Location of Robotic elements / devices / machines	Best Effort	14.4	0.0144	< 500
	Work Force Mgmt	Personnel Mgmt	DFM-1	Normal / Daily	Daily Assignment via form based data	Best Effort	64	0.064	1000
		Personnel Mgmt	DFM-2	Incident / Event	Event personnel assignments, accounting, etc - Interactive form	Predictive	64	0.064	1000
Asset Mgmt	All Asset Types	DAM-1	Normal / Daily	Daily mgmt & tracking of assets - assignment / status form based	Best Effort	64	0.064	4000	
	All Asset Types	DAM-2	Incident / Event	Event / Incident mgmt and tracking of assets-assignment/status form based	Best Effort	64	0.064	4000	
Robotics		DRS-1	Control	Remote control / mgmt of robotic devices	Guaranteed	64	0.064	< 250	
		DRS-2	Data	Robotic gathered/ assembled data	Predictive	varies	varies	varies	
Video	Media	Video	DMV-1	Real-Time	Broadcast Quality - Uni-Directional - 24-30 fps	Guaranteed	1000	1	< 500
			DMV-2	Real-Time	Basic Quality - Uni-Directional - 15 fps	Predictive	375	0.375	1000
			DMV-3	Streaming	Store and Forward - Uni-Directional - 8-10 fps	Predictive	250	0.25	1000
			DMV-4	Conferencing	Multi-participant Video - Voice - Media - Bi-Directional - 15 fps	Guaranteed	450	0.45	< 150