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July 20, 2007

Via Electronic Submission

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

Re: Notice of Oral *Ex Parte* Communication
WT Docket Nos. 06-150, 06-169 and 96-86
PS Docket No. 06-229

Dear Ms. Dortch:

This letter is to notify you that Dr. Robert F. Brammer, Senior Vice President and Chief Technology Officer, William J. Andrle, Jr., and I met with Commissioner Jonathan S. Adelstein, Barry J. Ohlson, Senior Legal Advisor to Commissioner Adelstein, and Renée Crittendon, Acting Legal Advisor to Commissioner Adelstein, on July 18, 2007 to discuss the position of Northrop Grumman Information Technology, Inc. ("Northrop Grumman") in the above referenced 700 MHz rule making proceedings, consistent with the written submissions of Northrop Grumman in these proceedings.

In the discussion, Northrop Grumman highlighted the following points:

- It is paramount that public safety receives mission-critical, always available, life safety-grade communications service that supports advanced applications. This can be done best and most cost-effectively with open standards technology, leveraging the scale and research and development of the commercial wireless equipment market, but a public safety network must also be built to meet absolute needs and not merely to meet service level averages as with existing commercial wireless networks;

- The Commission should forebear from making a choice now of a single broadband wireless technology for public safety, inasmuch as many potentially attractive "4G" broadband technologies are still in the final stages of development and/or standards finalization;

- "Wideband" operations should not be permitted in the broadband public safety spectrum, inasmuch as they would prevent any "4G" technologies from operating in that same service area and in adjacent areas. It is now fully documented in these proceedings that broadband technology is the same cost or less expensive than "wideband" -- in all areas, urban, suburban and rural -- with broadband having vastly greater functionality and spectral efficiency, as well as a robust development path. Alternatively, if there are adequate safeguards to protect narrowband and broadband operations, it is possible for "wideband" to operate in guard band and narrowband public safety spectrum;

- An open access framework for a shared public/private network is feasible from a technology standpoint. Nonetheless, other variables are also vitally important for public safety, such as network design (the amount of capacity allocated to public safety, as well as security, redundancy and resiliency) and appropriate network management protocols, such as user, application, and throughput priorities. The proposed negotiation process between the commercial licensee and public safety licensee, the dispute resolution framework, and appropriate Commission oversight will all be critical to fleshing out these important details correctly to assure that public safety's needs are met; and

- It is vital that the licensee of the commercial block subject to public safety sharing and build-out obligations have the proper incentives and orientation to fulfill, genuinely and completely, their unique role.

If you have any questions regarding this notice, please do not hesitate to contact the undersigned.

Sincerely,

cc: The Honorable Jonathan S. Adelstein
Barry J. Ohlson
Ms. Renée Crittendon