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July 24, 2007

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th St., SW  
Washington, DC 20554

Re: Ensuring a Commercially Viable Network to Support Public Safety;  
WT Docket Nos. 96-86, 06-150; PS Docket No. 06-229

Dear Ms. Dortch:

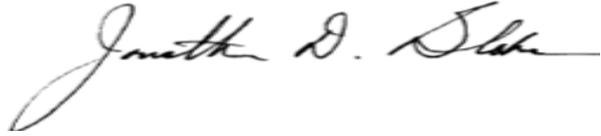
As the National Public Safety Telecommunications Council (“NPSTC”) has made clear, the 4G, nationwide, broadband network essential to solving the interoperability crisis “must be funded pursuant to a public safety-commercial partnership.” In the coming days, as the Commission makes the basic allocation decisions that are prerequisite to the success of such a partnership -- most notably, establishment of a national public safety license and a national, commercial D Block -- it should not prematurely rule on the more particular technical issues that will directly affect the technological and commercial viability of that network. Such issues can and should be decided at a later date.

***The Commission’s imminent decision should adopt baseline protections and principles, while leaving the technical, design and operational details flowing from those principles to future development.*** Frontline Wireless, LLC has consistently advocated the establishment of baseline principles to ensure that the shared network serves public safety’s standards for coverage, reliability, security, and continuity. In the first instance, the National Public Safety Licensee (“NPSL”) and the D Block Licensee would negotiate as to implementation of these principles. If the two sides could not agree, the Commission would develop a record to arbitrate the dispute according to a standard that the network achieve those protections in a manner that is technically and commercially reasonable.

***This approach recognizes that the shared public/private partnership must be commercially and technically viable.*** If the Commission were instead to adopt specific, technical rules that overreach on network requirements, and didn’t take into account commercial viability, the private market wouldn’t come to the table and public safety will be left with the outmoded communications infrastructure it has today. The public safety community needs a broadband infrastructure that provides national interoperability and the ability to meet the unique needs of local and state agencies. But it’s not possible in the next few days for the Commission to correctly ascertain how those state and local needs should translate into network requirements.

The Commission is poised to establish the structure for a successful public/private partnership that will at last give our nation's first responders the communications tools they deserve. By establishing that structure while allowing interested parties to develop the details of how it should be implemented, the Commission will strike a wise balance.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jonathan D. Blake". The signature is written in a cursive style with a large, sweeping initial "J".

Jonathan D. Blake  
*Counsel to Frontline Wireless, LLC*