

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Service Rules for the 698-746, 747-762 and 777-792 MHz Bands)	WT Docket No. 06-150
)	
Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band)	PS Docket No. 06-229
)	

Comments of Telecommunications Development Corp.

Telecommunications Development Corp. ("TDC") submits these Comments in response to the Commission's Public Notice¹ in the above referenced proceeding².

Introduction

TDC has unparalleled high-level subject matter expertise managing broadband wireless public safety projects and extensive knowledge of public safety communications, including specific relevant experience ameliorating the interoperability challenges facing the Nation's First Responders. TDC has been providing design, project management, engineering and regulatory support for the District of Columbia's Wireless Accelerated Responder Network (WARN) and for the National Capital Region's Regional Wireless Broadband Network (RWBN) since the

¹ Public Notice, *FCC DA 08-1194, Released May 21, 2008.*

² See Service Rules for the 698-746, 747-762 and 777-792 MHz Bands, WT Docket No. 06-150, Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band, PS Docket No. 06-229, *Second Further Notice of Proposed Rulemaking*, FCC 08-128 (rel. May 14, 2008) (*Second Further Notice*).

inception of each project and maintains the baseline knowledge of these programs and the entire National Capital Region Interoperability Program (NCRIP). As part of the work provided to the District and the NCR, TDC successfully completed an evaluation of various wireless broadband technologies and spectrum options, created the preliminary site designs for both networks used for budgeting purposes, and developed the contracts that enabled the District and the NCR to procure the equipment and services needed to deploy their wireless broadband networks for Public Safety, is currently providing the Operation and Maintenance management for the RWBN system and is managing the equipment infrastructure vendor responsible for deployment of the various phases of the NCR's RWBN system.

During this work TDC developed deep working relationships with the NCR's MetroCIOs, radio managers and first responder community, regional jurisdictions that surround the NCR, the national public safety agencies, and the Federal Communications Commission (FCC)...all playing a vital role in these projects. TDC was among the first vendors in the county to have conceived, developed and deployed wireless public safety broadband systems at 700 MHz.

TDC's interest in this proceeding stems from our long history and considerable experience in public safety and optimizing wireless networks. TDC recognizes the continued development of public safety spectrum needs and resources, and offers these comments and suggestions as opportunities for FCC consideration, deliberation, and possible development as a continuation of the 700 MHz proceedings.

Discussion

TDC suggests a paradigm shift when discussing public safety and eligible public safety spectrum users. In Section A of this *Second Further Notice*, the Commission seeks comment on the user eligibility for the subject frequency bands. The definition of public safety and eligible users for this 700 MHz spectrum should be

inclusive of the broadband telecommunications functional needs and requirements encompassing national and regional 'critical infrastructure' and key resource assets³. The US Department of Homeland Security (DHS) identified 17 National Critical Infrastructure Protection Sectors⁴, and defines critical infrastructure, or CI, and a "comprehensive risk management framework that clearly defines critical infrastructure protection roles and responsibilities for all levels of government, private industry, non-governmental agencies and tribal partners". TDC submits the needs of CI, specifically (for example) within the National Capital Region (NCR) and the District of Columbia, have significant broadband data needs and interoperability requirements which the remaining unauctioned 700 MHz spectrum could accommodate along with the mission critical needs of traditional public safety users. The addition of CI to the eligible users as suggested by the Commission under the Public Safety Broadband Licensee (paragraphs 30-31), could also add a class of potential users interested in facilitating other funding opportunities for the PSBL and broaden the base of potential rate payers for the services of a broadband network – in effect spreading the cost amongst more users and thus lowering the per user cost for these services. TDC submits the Commission should, as sought in Section B, Paragraph 186, adopt a regional public safety approach and, at a minimum, allow regional networks under deployment (for example, the NCR RWBN) an opportunity to work directly with either a regional auction license winner and have a decision making stake-holder position on the national PSBL (provided the structure of the PSBL remains).

Section C, Paragraph 211 addresses the alternative method permitting build-out of a regional/state/local public safety broadband network. TDC believes the regional public safety deployment and an operation is the best solution. Given such regional efforts are to date often self-funded, we believe these regional networks should have autonomy to discuss a relationship directly with the commercial auction

³ See DHS National Response Framework (January 2008)

⁴ See DHS National Infrastructure Protection Plan (NIPP)/Sector Overview (June, 2006).

winner in order to meet regional public safety and critical infrastructure requirements. These requirements could be developed with the PSBL.

Municipality's most needing advanced public safety communications systems will find a way to fund networks, either via grants from the Federal government, or by use of general tax revenue. The cost factor tends to separate those with "needs" from those with "wants". What is critical with deployment of regional public safety systems (and any subset or superset of same) is that a common standards-based architecture be adhered to so that when "want" evolves to "need" the network being deployed will automatically interoperate with other local and regional networks. Over time these regional networks will morph into the national network we believe is critical to protect the lives and property of our citizens

Conclusion

The FCC faces many challenges particular to the 700 MHz band...TDC applauds the release of this *Second Further Notice* and believes the Commission will formulate superior guidelines for the much needed development of a national public safety broadband infrastructure. However, national public safety policy goes beyond 700 MHz and ultimately should consider the entire arena of public safety, including the DHS National Response Framework. Progress has certainly been made in the development of Interoperable Communications Plan(s). Many issues need addressing, beyond but related to the 700 MHz issues. Many of these involve the broadband needs and use by critical infrastructure, and therefore involve the need and utility of broadband public safety networks by Federal users, and discussion on how do municipalities decide to deploy unlicensed mixed (public safety and public access) use wireless broadband networks.

We advocate a modification of the Commission rules, as anticipated by this *Second Further Notice*, to promote the deployment of regional broadband public safety networks as part of a common, standards based national network infrastructure.

Respectfully submitted this 20th day of June, 2008

A handwritten signature in black ink, appearing to be 'JW', is written over a horizontal line. The signature is stylized and somewhat cursive.

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