



October 24, 2008

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

Re: WT Docket No. 06-150
PS Docket No. 06-229

Dear Ms. Dortch:

Pursuant to Section 1.1206(b)(2) of the Commission's Rules, this is to notify you that on October 23, 2008, Stu Overby, Phil Dobosz and I met with Derek Poarch, Chief of the Public Safety and Homeland Security Bureau, as well Tim Peterson, David Furth, Jeff Cohn and Tom Beers, regarding the regarding the above captioned proceedings.

During the meeting we discussed the attached slides describing a process by which the FCC could obtain accurate information regarding the cost of relocating eligible narrowband equipment in the 700 MHz band and use this information to establish an appropriate cap on relocation compensation well in advance of a D-block auction. The proposal would base the cap on "not to exceed" cost estimates provided by the licensees. The details and costs associated with relocating public safety equipment will necessarily vary from licensee to licensee and will depend not only on the quantities of individual pieces of equipment deployed, but also on the exact mix and configuration of the system as well as and numerous other details.

Motorola is concerned that establishing a cap based on incomplete information could lead to a shortage of available funds that will ultimately delay deployment of the nationwide broadband network in areas where public safety licensees are left with insufficient funds to relocate their narrowband equipment. Motorola stressed the point that such uncertainty is not necessary and proposed a method whereby the Commission could require licensees to provide "not to exceed" estimates based on their individual systems. These estimates could be available at least 60 days before an auction and would provide the certainty necessary for bidders to bid with confidence regarding the relocation liability and would minimize any chance of delay of deploying the nationwide broadband network due to potentially insufficient funds for relocating narrowband systems. Further refinement of the "not to exceed" estimates could occur during the period in which the Public safety Broadband Licensee and the D-block winner negotiate the Network Sharing Agreement



Pursuant to the Commission's Rules, one copy of this notice is being filed electronically with the Commission. If you require any additional information please contact the undersigned at (202) 371-6953.

Sincerely,

/s/ Steve B. Sharkey

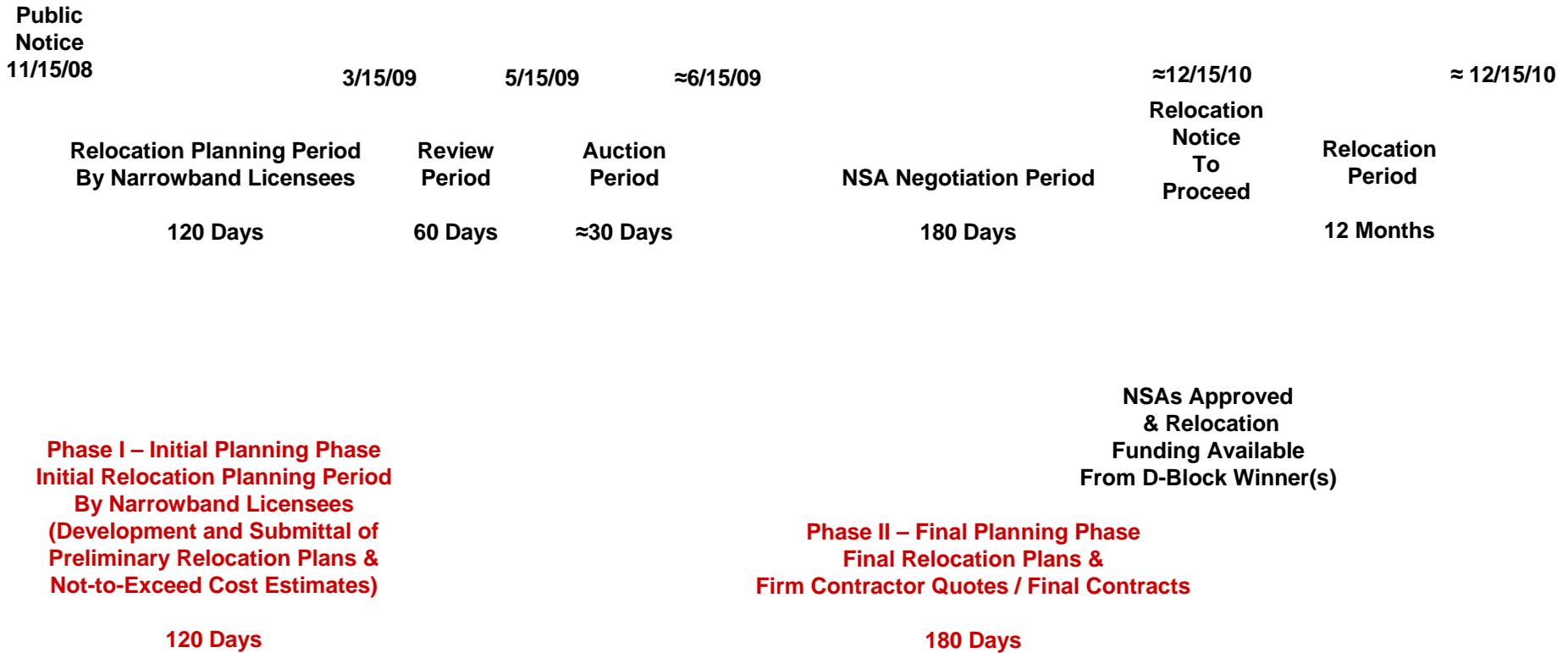
Steve B. Sharkey
Senior Director, Regulatory and Spectrum Policy

Cc: Chief Derek Poarch
Tim Peterson
David Furth
Jeff Cohn
Tom Beers

Narrowband Relocation

- **FCC Objective**
 - Provide certainty regarding relocations costs to bidders
 - Limit funds for relocating narrowband systems
- **Issues with Current \$27 million Cap**
 - Based on partial information
 - No “one size fits all” approach
 - Vehicular repeaters may range from \$1k to \$10k depending on specific circumstances
 - Insufficient funds may leave licensees unable to move
 - Introduces additional uncertainty regarding broadband deployment if relocation is delayed because of lack of funds and potential legal challenges
 - PSST estimate significantly exceeds FCC \$27 million
- **Proposed Solution**
 - Licensees required to provide “not-to-exceed” estimate well in advance of auction
 - Provides time after the auction for the FCC, D-block licensee and PSST to review costs and ensure that only allowed costs are included.

Example 700 MHz Relocation Process Timeline



700 MHz Narrowband Relocation Plans and Cost Estimates Required Detailed Information

Relocation Plans

- Detailed System Description
- Frequency Plan Changes (List of Sites / Frequencies at Each Site)
- List of Affected Equipment at Each Site (Repeaters / Combiners / Antennas)
- Field Equipment Inventory (Control Stations / Mobiles / Portables / Vehicular Repeaters / BDAs, etc.)
- Frequency Relocation Migration Process Description (Infrastructure and Fielded Units)
- Work Breakdown Structure / Project Schedule
- Acceptance Test Plan
- Documentation Requirements

Not-To-Exceed Cost Estimates

- Turn-Key Contractor Cost Estimates, or
- Task Level Labor Estimates and Subcontractor Costs
- Project Engineering and Project Management
- Travel Time and Travel Expenses
- Warehouse and Temporary Facilities Expenses
- Replacement Equipment and Software Costs
- Licensee Consultant and Legal Expenses
- Other Allowable Licensee Expenses