

November 12, 2008

ELECTRONIC FILING

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

**Re: Service Rules for the 698-746, 747-762 and 777-792 MHz Bands, Implementing a
Nationwide Broadband, Interoperable Public Safety Network in the 700 MHz Band;
Docket Nos. 06-150 and 06-229**

Dear Ms. Dortch:

The Boeing Company (“Boeing”), through its counsel, hereby submits these reply comments in the above-referenced rulemaking proceeding regarding the 700 MHz public/private broadband communications network. Boeing is a global leader in the design, manufacture and launch of satellite communications networks for government and commercial customers. Boeing was also a long-time participant in the Commission’s efforts to issue licenses for the 2 GHz mobile-satellite service (“MSS”), and to adopt rules to permit MSS licensees to enhance the availability of their services through the addition of an ancillary terrestrial component. Boeing has a keen interest in the continued development of next-generation satellite services and technologies, and in the important benefits that such services can provide to the public safety community.

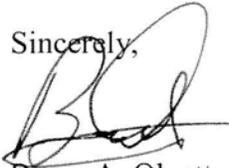
Boeing supports the Commission’s proposal to integrate a satellite component with the public/private broadband communications network. Boeing, however, urges the Commission to require that 700 MHz public safety devices have satellite capability incorporated into at least one model of each major device type (such as laptop card, phone and PDA) within three years, and half of all models within five years of the award of the D-block license. Greater integration of a satellite component into the shared public/private broadband communications network will help to ensure that the network has back-up capability and can provide ubiquitous coverage, both of which are critical for public safety services.

Requiring satellite communications capabilities in only a single handset would likely be insufficient to result in appreciable penetration and use of satellite-capable devices in the public safety

community. When emergencies occur, public safety personnel naturally turn to the equipment and procedures with which they are most familiar. If terrestrial communications systems fail, emergency responders will shift to satellite communications resources only if such devices are readily accessible for their use and have been the subject of widespread training. In order to achieve this level of availability and familiarity, a satellite component should be integrated into at least one model of each major device type and eventually into at least half of all models.

By increasing the availability of satellite-capable devices in this manner, the Commission will boost significantly the likelihood that emergency responders will not only have such devices at their disposal, but will in fact use the devices in emergency situations. Finally, widespread availability of satellite-capable devices will reduce the incremental cost of these devices to the first responder community.

Thank you for your consideration of this matter.

Sincerely,


Bruce A. Olcott
Counsel to The Boeing Company