



November 19, 2008

VIA ELECTRONIC FILING

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

RE: ***EX PARTE***: Service Rules for the 698-746, 747-762 and 747-762 and 777-792 MHz Bands; Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band, WT Docket No. 06-150, PS Docket No. 06-229

Dear Ms. Dortch:

Yesterday, Jim Bugel, Assistant Vice President – Federal Regulatory Affairs and Stacey Black, Executive Director – Market Development of AT&T Inc. (“AT&T”) met with Derek Poarch, Chief, and Jeff Cohen, Senior Legal Counsel of the Public Safety and Homeland Security Bureau. During the meeting, AT&T reviewed the points made in its comments and reply comments filed in this docket. AT&T also distributed the attached documents.

Respectfully submitted,

/s/ Jim Bugel

Jim Bugel
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Attachments

cc: Derek Poarch
Jeff Cohen

Shared Wireless Broadband Network

AT&T's Vision of a Public/Private Partnership



Summary of Proposed Solutions

- Assign the D block spectrum to public safety and use a regional RFP process to lease the spectrum to commercial partners.
- Develop national interoperability standards that would be required in all RFPs
- Use regional RFP templates and minimum NSA Terms and Conditions that can be tailored to for each region
- Leverage existing infrastructure where available and a multi-phase approach build out.
- Permit the licensing and construction of interoperable private networks by local jurisdictions

How The RFP Process Would Work

- Develop a national requirements that would be followed to insure long term interoperability.
- Develop NSA provisions that regional entities need to consider when drafting their RFPs.
- The regional entity decides on whether to build its own network or enter into a public/private partnership with a commercial operator.
- In either case, the RFP must require the national technology standards developed by the PSBL
- Public/Private partnership based on spectrum lease with a commercial operator and subscription-based broadband services for regional entities.
- Resulting agreement include build plan and other requirements

How The RFP Process Would Work...2

- Regional RFP for obtaining the highest bids for leasing shared spectrum from public safety licensee by commercial operator.
- Also used for obtaining lowest monthly service cost for subscription to the shared commercial network
- RFP should propose multiple phases that outlines broadband requirements in the near term through a desired end state
 - Near-term: existing commercial services
 - Mid-term: may include negotiated coverage enhancements; back-up power additions, etc.
 - End state design includes 700Mhz buildout using common air interface, QoS priority standards implementation; VoIP PTT, etc.
- RFP would have draft NSA as part of initial package

Local Build Out by Regional Entities

- AT&T proposes that regional entities be able to receive licenses to build out 700Mhz broadband networks
- Must use common air interface as shared networks
- No requirement for commercial partner to purchase or reimburse privately-built networks
- Public Safety devices should have seamless roaming between private networks and shared networks