

Marlene Dortch, Secretary
Federal Communication Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Addendum Comments
PS Docket 06-229

Dear Ms. Dortch,

The material submitted today is for inclusion in 06-229 proceedings as an addendum to prior comments (postings on 8/25/08, 7/07/09, and 6/09/08). It explores the possible revenue streams of a SWBN when optimized as a public service utility for delivering communications amongst and between public safety vehicles, personnel and command centers. However for this discussion, the myriad of benefits of its use will focus mainly on the potential billions of dollars from services it provides to the general public.

Given that the D-Block proceeding is very complex in its purpose, more analytical resources are needed before the Commission finds a decision that's satisfactory and sustainable between DBLs and public safety personnel. Movement towards a telematic cooperative as the balancing means between profits and public safety would require several advisory committees to define the risks in such a venture for investors, entrepreneurs, and the ever decreasing Tier 2/3 wireless carriers. Being that this issue is so complex; a solution that is not typical of any other business partnership should warrant an atypical auction.

Advisement for network transparency offers unique opportunities for DBLs to establish themselves as both a central source for travel data and a forum for interaction amongst and between private citizens and public officials. Examples of specific public data aggregates and network possible interactions will be outlined in a forthcoming addendum. Presented in a site-map format, it should aid in further evaluations as to the amount of Internet traffic it could generate. Moreover, analysts could make a better assessment as to its revenue potential for DBLs than estimated in this discussion.

Further revenue matters concerning voice calling from private vehicles is another complex issue dividing the public and private service sectors. DBL profits from that service has been omitted from this addendum since its regulatory parameters are yet-to-be defined by an official advisory committee.

A public telematics cooperative is ideal for interstate roaming and interoperability for public safety users as much as it is for private users. However, the borders of Hawaii and Alaska make the likelihood of adding additional out-of-state private and second responder vehicles and their emergency equipment unsuitable for participating in a national telematics network. Since most major jurisdictions already have interoperability in place for their first responders, and a telematics SWBN would be redundant to intrastate responders and central to out-of-state second responders in such areas, Alaska and Hawaii should be excluded from a D-Block auction and granted full spectrum use by public safety users.

Respectfully submitted,

Bill Reimann