



February 24, 2010

Via Electronic Filing

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

Re: **EX PARTE**
GN Docket Nos. 09-47, 09-51, 09-137; WT Docket No. 06-150;
PS Docket No. 06-229

Dear Ms. Dortch:

On February 23, 2010, Bob Calaff, Michael Amend, Mark McDiarmid, Yasmin Karimli, Eric Hagerson and the undersigned of T-Mobile USA, Inc. (“T-Mobile”), and Dr. Kostas Liopiros of the Sun Fire Group LLC on behalf of T-Mobile, participated in a conference call with Tom Peters, Director, Wireless Engineering, of the Commission’s Broadband Task Force, John Leibovitz, Deputy Chief of the Wireless Telecommunications Bureau (“Bureau”), and Paul Murray, Assistant Chief of the Bureau.

The call explored issues related to the implementation of an interoperable wireless broadband network for public safety by leveraging existing commercial wireless networks. Consistent with the views T-Mobile expressed in the comments and other filings that it has submitted in the above-referenced proceedings, its representatives discussed how the Commission could establish a flexible framework for a public/private partnership for public safety broadband access.

T-Mobile and the FCC staff discussed the technical issues involved in assuring public safety access to their services and applications when roaming on commercial networks. T-Mobile noted that developments in the commercial arena, such as IP Multimedia Subsystem (IMS), can be applied in the public safety domain to support roaming of broadband applications. Commercial carriers have significant experience with making basic applications (e.g., SMS, voice, etc.) function across different carriers’ networks. Similarly, service and application interoperability is being addressed through such organizations as the IMS Forum (<http://www.imsforum.org/about>).

T-Mobile and the FCC staff next discussed ways to implement Wireless Priority Service (WPS) on commercial networks for broadband applications. T-Mobile noted that although priority access is not yet fully standardized in the LTE core, progress is being made in Release 9 to integrate priority access for LTE networks. The public safety community could negotiate priority access to commercial networks in times of emergencies, analogous to the present experience. For example, the existing WPS architecture gives a user priority voice communications through the entry of a numeric code. Wireless priority access for data in a commercial network would provide an individual user with dedicated bandwidth and core network resources. The amount of dedicated resources could vary by the device and user. Triggering WPS for data could be done by a central authority either by the network operator or on an individual handset through secure communications to the network core. Clear regulatory procedures, however, would have to be enacted for a commercial carrier to implement wireless priority access for data.

Finally, T-Mobile and the FCC staff discussed the issue of roaming fees for broadband access. T-Mobile noted that the paradigm for commercial data roaming services is evolving as data usage continues to grow, but even these new structures may not be appropriate for the different usage patterns in a public safety context. T-Mobile emphasized that ensuring public safety has competitive alternatives is key. The goal of the roaming fee structure would be to fairly compensate commercial carriers given the unique needs and purposes of public safety users, while at the same time offering services to public safety agencies at reasonable rates.

Pursuant to Section 1.1206(b) of the Commission's rules, an electronic copy of this letter is being filed with the office of the Secretary. If you have any questions regarding this notification, please contact the undersigned.

Very truly yours,

/s/ Kathleen O'Brien Ham

Kathleen O'Brien Ham
Vice President, Federal Regulatory Affairs

cc: Tom Peters
John Leibovitz
Paul Murray