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March 3, 2010

EX PARTE NOTICE

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

In re: A National Broadband Plan for our Future
GN Docket No. 09-51

Dear Ms. Dortch:

On March 2, 2010, Stacey Black, Assistant Vice President of AT&T Services, Inc. made a brief statement at the Public Forum on Proposal To Create An Emergency Response Interoperability Center that was held at the Federal Communications Commission. Attached is his prepared statement to be included in the record.

Pursuant to Section 1.1206 of the Commission's rules, an electronic copy of this letter is being filed for inclusion in the above-referenced docket.

Respectfully Submitted,

/s/ Jim Bugel
Assistant Vice President
Public Safety and Homeland Security
AT&T Services, Inc.
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Attachment

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

PUBLIC FORUM ON PROPOSAL TO CREATE AN EMERGENCY RESPONSE
INTEROPERABILITY CENTER
February 10, 2010

Statement of
STACEY BLACK, ASSISTANT VICE PRESIDENT
AT&T SERVICES INC.

Bureau Chief Barnett and Members of the Public Safety and Homeland Security Bureau:

My name is Stacey Black, and I am from AT&T's Mobility Product Management organization that focuses on wireless product development within the public safety sector among others. AT&T appreciates the opportunity to provide its comments regarding the proposed Emergency Response Interoperability Center and its role in establishing broadband communications for our nation's public safety community.

We applaud the Commission in its effort to establish an organization that focuses on public safety broadband. While we understand that interoperability is a key component, AT&T believes that *operability*, which we define as designing, deploying and operating a network, is going to be an equal, if not more important, responsibility than interoperability. Indeed, unless you have multiple public safety broadband networks operating around the country, you will not have an interoperability issue to manage. Therefore, we suggest the new organization's mission be focused first on the adoption of broadband by public safety, second, on spectrum management, interference and license coordination, and finally, standards and interoperability planning. With this in mind, AT&T would like to offer its thoughts for the proposed organization:

At a high level, we see three components of the organization: Outreach and Education, Operations and Coordination, and finally, Standards and Planning. These three areas would most likely reside in different organizations leveraging their individual expertise, but as long as the Commission provides a framework for cross-functional communications, collaboration and the leadership, we believe the model could be successful in not only managing interoperability, but more importantly in increasing the adoption of broadband by the public safety community.

Outreach and Education

We believe the ERIC can drive adoption of broadband by offering a technical support and education resource drawing on the collective expertise of the private sector and other

government agencies such as DHS and NIST. While it may be that DHS is best suited to serve in the outreach effort since it performs this function today, we cannot reinforce enough the huge differences that exist between land mobile and broadband radio technologies. Through an on-going outreach program, this component should serve as the collection point of best practices from agencies that have deployed or are in the process of procuring or deploying a broadband network. This should include RFI/RFP development templates, grants application assistance, and even perhaps chairing a User or Advisory Group where industry and public safety practitioners can have an open dialog with needs and requirements for broadband. AT&T would be willing to participate in such an advisory capacity.

Operations & Coordination

The Operations and Coordination component is also focused on operability and AT&T suggest that it be housed at the FCC. This component should assume the responsibility for review and/or approval of the licensing or spectrum lease application process from regional broadband applicants. As part of the process, applicants should submit a comprehensive plan that includes their funding proposal, any proposed public-private partnership arrangement, a detailed deployment schedule, and a plan to deal with incumbent 700 MHz narrowband operations. In addition to performing traditional frequency coordination and interference mitigation, this component of the ERIC should also be responsible for reviewing broadband applicant's plans for dealing with the incumbent 700 MHz narrowband licensees who may interfere with, or be interfered by, the proposed broadband network. As a coordination entity, this group should facilitate communications between the broadband applicant and the narrowband licensee to insure both parties achieve their objectives. While we see this component as a Commission responsibility, we also recognize that third parties may need to be contracted with to assist one or more of the many tasks involved.

Standards and Planning

The final component of the ERIC will play a critical role in the planning and standards work required in developing and deploying regional broadband networks that will ultimately become a network of interoperable networks. In its ERIC concept paper, the Commission outlined a number of requirements that it believed should be adopted, including encryption, authentication, roaming, and priority access. All or most of these requirements exist in the 3GPP standards today, and in order to keep costs down and leverage the economies of scale of the wireless industry, it is vital that public safety broadband networks are developed using these existing standards. However, we understand there will be some unique aspects to the public safety networks that were pointed out in NPSTC's Broadband Task Force activity, such as the need for a unique Mobile Network Code to identify public safety networks. To address this, we suggest this component of ERIC be active in standards forums and industry associations such as the CTIA, to insure that there is alignment with the needs of public safety and that of the commercial

Statement of Stacey Black
AT&T Services
March 2, 2010

wireless industry. We applauded the work of NPSTC and the broadband task force as it, under the guidance of NIST, embraced the 3GPP standards in its technical working group. We would highly recommend and applaud NIST's on-going involvement in this component of ERIC, and perhaps its leadership in planning and standards coordination. AT&T, as a member of all of these standards groups, would be honored to partner with NIST and the FCC in this activity and to insure that public safety is represented appropriately in these standards bodies.

In conclusion, these three working areas, under the leadership of the Public Safety and Homeland Security Bureau, have unique responsibilities that when combined as a total activity, has the potential of dramatically impacting the adoption of broadband by the public safety community, through advance planning and standards development, through an impartial license application and plan review process, and providing the education and outreach necessary to remove the uncertainties of deploying IP-based, wireless broadband networks.

Thank you.

