



April 5, 2010

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Service Rules for the 698-746, 747-762 and 777-792 MHz Bands)	WT Docket No. 06-150
)	
Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band)	PS Docket No. 06-229
)	

Chairman Julius Genachowski
Federal Communications Commission
445 12th Street, S.W.
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Washington, DC 20554

**COMMENTS OF
LOS ANGELES REGIONAL INTEROPERABLE COMMUNICATIONS
SYSTEM (LA-RICS)**

LA-RICS respectfully submits these comments in response to the Public Safety and Homeland Security Bureau's ("Bureau") Public Notice of March 17, 2010 in the above-captioned proceedings. The Public Notice seeks comment on the recommendations of the Public Safety Spectrum Trust ("PSST") and the National Public Safety Telecommunications Council Broadband Task Force ("BBTF") regarding "the minimum requirements necessary to allow localities and regions to build out local

systems as part of the 700 MHz nationwide, interoperable wireless broadband public safety network.”¹

As the Bureau is aware, LA-RICS has submitted a request for waiver of the Commission’s rules to enable it to begin deployment and operation of a wireless public safety broadband network using the 700 MHz public safety spectrum. Across our nation, First Responders continue to lack access to interoperable wireless broadband communications, and the public safety spectrum in the 700 MHz band is prime spectrum to address this. To that end, LA-RICS supports the PSST and BBTF recommendations, which are consistent with LA-RICS pending waiver petition and the Commission’s public interest objectives in promoting the deployment of a 700 MHz public safety broadband network. LA-RICS notes, however, that the previously unsuccessful D Block auction should serve as a cautionary tale – as explained below, the Commission must balance the public interest in mandating a technology and deployment “reach” with the immediate need for deployment and services.

I. LA-RICS SUPPORTS THE RECOMMENDATIONS AS AN IMPORTANT CORNERSTONE TO THE ADVANCE DEPLOYMENT OF AN INTEROPERABLE PUBLIC SAFETY BROADBAND NETWORK

LA-RICS urges the Commission to move forward on its long-pending waiver petition expeditiously in the wake of the National Broadband Plan submitted to Congress last month. LA-RICS is supportive of both the PSST’s recommendations and the substance of the BBTF report, but it is important for the Commission to adopt those recommendations that foster meaningful and prompt deployment. Not all steps are

¹ See Public Notice, *Comment Sought on NPSTC Broadband Task Force and Public Safety Spectrum Trust Technical Recommendations for 700 MHz Public Safety Broadband Deployments*, WT Docket No. 06-150, PS Docket No. 06-229, DA 10-458 (PSHSB rel. Mar. 17, 2010) (“Public Notice”).

necessary at the initial stage of launch and operations and, in fact, implementing some requirements could be premature and counter-productive at this time.

LA-RICS therefore recommends that the Commission condition its grant of 700 MHz public safety waivers on implementation of those recommendations that, as a general matter, relate to provision of basic LTE broadband data and IP access services. This approach will ensure a sufficient beachhead for 700 MHz public safety LTE requirements and provide immediate benefits for public safety data applications, while leaving time for upper layer application interoperability requirements to mature.

The initial requirements can be supplemented as relevant technical and interoperability standards are resolved in the future, particularly at the application level. Indeed, the BBTF's recommendations, by their terms, acknowledge several open issues and matters for future study. The recommendations thus serve as an important and pragmatic starting point for developing longer term interoperability standards, but also recognize that additional work is necessary to meet the Commission's ultimate objectives.

LA-RICS submits that grant of its waiver request, subject to conditions that relate to the deployment of the basic network infrastructure and capabilities, will enable it to begin that deployment consistent with the Commission's objectives. As explained below, full implementation of all of the recommendations at the outset of service is not necessary as a prerequisite for 700 MHz public safety licensees to initiate service. Indeed, allowing LA-RICS and other public safety entities to begin the deployment of their basic infrastructure at 700 MHz as a condition of waiver can help industry and the

Commission in determining the level of standardization required, and will provide valuable input for the Commission's new Emergency Response Interoperability Center as it develops technical and operations standards for the nationwide public safety broadband network.

II. AT THIS INITIAL STAGE, THE COMMISSION SHOULD EXCLUDE SMS-MMS MESSAGING, TEXT MESSAGING, AND LMR GATEWAY DEVICE SUPPORT FROM THE REQUIRED FEATURES

The Bureau seeks comment on whether to “condition any waiver disposition on adherence to the standards recommended by the BBTF and the PSST” and whether the recommendations are “sufficient to ensure later compatibility with a nationwide interoperable broadband network for public safety.”² LA-RICS generally believes that the recommendations are consistent with those objectives, and that phased implementation of certain of the recommended technical requirements will balance the need to accommodate those who are prepared to begin deployment of their 700 MHz public safety services in the near term, with the longer term interests in more expansive, interoperable broadband capabilities.

In particular, the Bureau “seek[s] comment on several specific aspects of the technical recommendations made by the BBTF and the PSST,” in particular the “Startup” requirements at Recommendation 6.2 and the “Minimum Applications” and “Security” features at Recommendation 6.3.³ Implementation of SMS-MMS Messaging would likely leverage legacy 2G/3G interfaces in the near-term, which are inconsistent with the longer-term direction of an all-IP, IMS (IP Multimedia Subsystem) based approach, thus increasing the risk that public safety licensees will incur costly retrofits. Even for commercial operator networks, issues

² See *id.* at 1-2.

³ *Id.* at 2.

concerning interoperability with 2G and 3G networks are under discussion, as voice and messaging (SMS) services alike on these networks will continue to utilize legacy mobile protocols that are not IP-based.⁴ LMR interworking is likely to have similar complexity. New device and software options, in turn, can emerge over time to take advantage of advanced applications and interoperability capabilities as they stabilize.

Specifically, with respect to the BBTF report, the Commission should exclude Recommendations 6.2.4 (SMS-MMS Messaging), 6.3.2.4 (Text Messaging) and 6.2.6 (LMR Gateway Devices) from the list of features required at service initiation. Although these are important capabilities which LA-RICS favors, a number of factors counsel against requiring that all of the recommendations be imposed as a condition of waiver grant. As an initial matter, it is clear that these requirements will significantly increase the costs, and delays, of deployment, and could result in challenges to obtain necessary public funding during these challenging economic times.

Keeping the initial public safety LTE deployment requirements at a basic level will enable licensees, ERIC and the Commission to address these contingencies in turn while minimizing the risk of sunk costs and outmoded capabilities.⁵

LA-RICS supports the remaining provisions of Recommendations 6.2 and 6.3, as identified in the Public Notice, in their current form.

⁴ These applications diverge among 3GPP and 3GPP2 legacy protocols for voice and messaging, and the IMS-based approach (which is the long term vision for LTE voice and messaging).

⁵ Even the basic LTE infrastructure capabilities will be capable of supporting full bandclass 14 at the public safety broadband block, thus providing public safety licensees with wireless broadband network capabilities and data applications (1) that are not presently available in the public safety broadband spectrum, and (2) in a manner that can readily support the D block spectrum at a future time.

CONCLUSION

For the foregoing reasons, LA-RICS supports the PSST and BBTF Recommendations, but initial requirements imposed on any 700 MHz public safety licensee waivers should be targeted at the provision of basic LTE broadband data and IP access services and should not include SMS-MMS messaging, text messaging, and LMR gateway device support.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "John Radeleff", is written over a horizontal line.

John Radeleff
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