

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of:	)	
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	)	
Comment Sought on NPSTC Broadband	)	WT Docket No. 06-150
Task Force and Public Safety Spectrum	)	PS Docket No. 06-229
Trust Technical Recommendations For 700	)	
MHz Public Safety Broadband Deployments	)	
	)	
	)	

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**REPLY COMMENTS OF MOTOROLA, INC.**

Motorola, Inc. (“Motorola”) hereby files these Reply Comments responding to the record in the above-captioned proceeding.

The record in this proceeding demonstrates the general consensus among stakeholders on the central points expressed in Motorola’s initial comments.<sup>1</sup> Specifically, all of the participating public safety entities, *i.e.*, those that intend to use and operate the wireless broadband networks at issue, endorse the essential framework of the Public Safety Spectrum Trust (“PSST”)<sup>2</sup> and National Public Safety Telecommunications Council (“NPSTC”) Broadband Task Force (“BBTF”)<sup>3</sup> recommendations, including the identification of 3GPP Release 8 (“LTE”) as the interoperable standard of all public safety

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<sup>1</sup> See Comments of Motorola, Inc., WT Docket No. 06-150, PS Docket No. 06-229 (filed April 6, 2010) (“Motorola Comments”).

<sup>2</sup> See PSST Recommendations, *attached to* Letter from Harlin McEwen to Chairman Julius Genachowski, PS Docket No. 06-229, WT Docket No. 06-150 (Dec. 15, 2009) (“PSST Report”).

<sup>3</sup> See NPSTC, *700 MHz Public Safety Broadband Task Force Report and Recommendations* (Sept. 4, 2009) *attached to* PSST Report (“BBTF Report”).

wireless broadband networks.<sup>4</sup> The Commenters generally agree that these recommendations strike the appropriate balance between flexibility and interoperability.

The recommendations, coupled with the recommendations previously submitted by Motorola, will achieve the goal of ensuring that the various public safety wireless networks provide the necessary capabilities and interoperability while also recognizing, as the State of New Mexico put it, that “[i]n the world of public safety communications, one size does not fit all.”<sup>5</sup> The key recommendation of the PSST and NPSTC, in terms of ensuring interoperability, was the identification of LTE as the radio access network standard of all public safety wireless broadband networks.<sup>6</sup> The LTE standard, along with the other suggestions made by the BBTF and PSST, would form an effective framework upon which the next generation of interoperable public safety wireless networks could be built. As the District of Columbia noted, “[i]f local networks were to comply with the BBTF Report’s recommendations, they would all be going in the same direction and providing valuable input for the development of that detailed interoperability standard, incorporating public safety requirements and resolving design issues, thereby saving public safety substantial cost and effort.”<sup>7</sup> This is further re-enforced by the comments of San Francisco Bay Area

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<sup>4</sup> See Comments of the District of Columbia, WT Docket No. 06-150, PS Docket No. 06-229 (filed April 6, 2010) (“District of Columbia Comments”); Comments of Los Angeles Regional Interoperable Communications System, WT Docket No. 06-150, PS Docket No. 06-229 (filed April 5, 2010) (“LA-RICS Comments”); Comments of San Francisco Bay Area Region, WT Docket No. 06-150, PS Docket No. 06-229 (filed April 6, 2010) (“Bay Area Comments”); Comments of the State of New Mexico, WT Docket No. 06-150, PS Docket No. 06-229 (filed April 6, 2010) (“New Mexico Comments”).

<sup>5</sup> New Mexico Comments at 3.

<sup>6</sup> See PSST Report at 1; BBTF Report at 5. The BBTF report makes clear that, when discussing “LTE,” it refers exclusively to 3GPP Release 8. See BBTF Report at 51.

<sup>7</sup> District of Columbia Comments at 2.

Region, which stated: “[i]t is important for the Commission to adopt those PSST and BBTF recommendations that foster meaningful *and* prompt deployment, granting the maximum authority to regional/local builders to construct while retaining the authority with the Public Safety Broadband Licensee (“PSBL”) necessary to achieve interoperability in the spectrum across the nation.”<sup>8</sup>

The Commission should reject calls to require anything less than LTE as the radio access network standard for the public safety broadband wireless network. For example, IPWireless recommends that the Commission instead require that the public safety networks be based upon any one of the currently available 3GPP release standards.<sup>9</sup> Motorola believes that adoption of this recommendation would defeat the fundamental goal of interoperability, which must be a primary concern for the Commission in this proceeding.

Under the IPWireless proposal, a variety of radio access network standards would be acceptable in the various local public safety broadband networks to be constructed pursuant to Commission waiver on the spectrum licensed to the PSST. This would permit networks to be deployed based on any of the 3GPP radio access technologies which in addition to LTE, would include GSM, UMTS, HSUPA or HSPA<sup>+</sup>. Without ensuring the networks adhere to a minimum requirement for support of LTE roaming users may not be able to take advantage of all or any available applications when they bring their device onto a different network. While IPWireless has deployed a 2.5 GHz broadband system for

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<sup>8</sup> See comments of San Francisco Bay Area Region at 2, PS Docket No. 06-229, (filed April 6, 2010).

<sup>9</sup> See Comments of IPWireless, Inc. at 3, PS Docket No. 06-229, WS Docket No. 06-150 (filed April 6, 2010) (“IPWireless Comments”).

the City of New York with technology other than LTE, Motorola sees no disadvantage to New York City by requiring LTE for 700 MHz interoperability. IPWireless claims its system enables the New York City the ability to migrate to LTE as the network is “software upgradeable to LTE when the city is ready to transition.”<sup>10</sup>

IPWireless also suggests that by requiring networks be based upon the LTE standard, the Commission would essentially freeze the development of public safety broadband networks and would prevent them from upgrading to future protocols, such as LTE-Advanced.<sup>11</sup> This argument discounts the extreme likelihood that future versions of LTE will provide backward compatibility to Release 8 of the standard. In any event, this is the precise sort of issue that the Emergency Response Interoperability Center will address in conjunction with the PSST on an ongoing basis. All networks constructed pursuant to waiver will benefit from the joint efforts of these two bodies, however it is incumbent on the Commission to provide the basis for interoperability now that will enable these waiver

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<sup>10</sup> See “IPWireless Provides Gillette, Wyoming with Citywide, End-to-End Mobile Broadband Wireless Network for Public Safety and Public Administration”, 9 March 2010, <http://www.ipwireless.com/news/pressreleases/press03092010>.

<sup>11</sup> See *id.* at 4.

networks to set the example and pave the way for future public safety broadband development.

Respectfully submitted,

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