

COALITION FOR 4G IN AMERICA

June 3, 2010

Written Ex Parte Presentation - via Electronic Filing

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

Re: 700 MHz Interoperable Broadband Public Safety Network
WT Docket No. 06-150, PS Docket No. 06-229,
GN Docket Nos. 09-47, 09-51, 09-137, RM Docket No. 11592

Dear Ms. Dortch:

As part of its directive to the Federal Communications Commission (FCC) to create a National Broadband Plan (NBP), Congress asked the Commission to develop a plan for the use of broadband infrastructure and services that would advance public safety and homeland security.^{1/} In the NBP released in March, the Commission proposed a comprehensive strategy for creating a nationwide interoperable public safety broadband wireless network (the PSBB network) for first responders and other public safety personnel.^{2/} Part of that strategy is to establish a mechanism to fund the costs to deploy a network throughout the United States that has the necessary coverage, resiliency and redundancy for first responders and other public safety personnel. Recently, the FCC's Omnibus Broadband Initiative (OBI) released a cost model supporting the NBP's funding recommendations for the PSBB network.^{3/} The cost model also explains how public safety agencies can leverage the deployment of fourth generation (4G) commercial wireless networks to reduce the costs of constructing their nationwide broadband network.^{4/}

The Coalition for 4G in America ("Coalition") supports the OBI's findings and endorses

^{1/} American Recovery and Reinvestment Act of 2009, Pub. L. No. 111-5, § 6001(k)(2)(D), 123 Stat. 115, 516 (2009).

^{2/} *Connecting America: The National Broadband Plan*, The Federal Communications Commission ("National Broadband Plan") (March 2010), at 314, available at <http://download.broadband.gov/plan/national-broadband-plan.pdf>.

^{3/} *A Broadband Network Cost Model: A Basis for Public Funding Essential to Bringing Nationwide Interoperable Communications to America's First Responders*, The Federal Communications Commission (April 2010) ("*Broadband Network Cost Model*").

^{4/} *Id.* at 3.

the assumptions that lead OBI to conclude that it would be efficient to build a PSBB network that takes advantage of commercial 4G wireless networks. Under the assumed model, the vast majority of sites will be built by a commercial partner using Long Term Evolution (LTE) technology, and costs would include installing and operating a dedicated 700 MHz radio access network (RAN) and sharing backhaul and Internet protocol (IP) transport systems.^{5/} The IP network architecture would give public safety entities dedicated servers for applications and services requiring high levels of security and privacy.^{6/}

Based on those assumptions, the OBI projects that as much as \$6.5B in capital funding will be required over a 10-year period to provide public safety broadband network capabilities to agencies that collectively serve 99% of all Americans.^{7/} The capital expenditure (CapEx) estimate was based on several assumptions regarding the number of towers that would be used, the cost to provision those towers and the cost of a fleet of temporary public safety transmitters.^{8/} Similarly, the OBI projects that the cost of funding operating costs will reach approximately \$1.3B annually, based on assumptions regarding the costs of Managed Services and ongoing support.^{9/}

Members of the Coalition have constructed and operated wireless communications networks and have extensive knowledge of the cost to construct and operate an interoperable wireless network. The Coalition believes that the OBI estimates and assumptions are reasonable based on the members' own internal cost estimates and their own experiences in the industry. Moreover, some Coalition members are actively assessing the use of LTE technology and concur in the OBI's assumptions regarding the "overlaid" use of a public safety RAN in connection with an interoperable commercial system using that technology. As potential commercial partners, the Coalition members agree that the FCC's assumptions are reasonable with regard to public safety and commercial carriers sharing the cost of IP transport services and the cost of the LTE roll-out. Given the projected lower capacity requirements for the core public safety network, the FCC's sharing proposal will result in substantial economic savings for public safety that could not otherwise be realized if public safety were to build its own duplicative core network.

The NBP presents the public safety community with a timely and unique opportunity to leverage commercial broadband technology through public/private partnerships for the next generation of public safety communications. The Coalition commends the Commission for its innovative approach to meeting critical public safety communications requirements and looks forward to working with the FCC to continue to implement the NBP's important public safety goals.

^{5/} *Id.* at 5.

^{6/} *Id.*

^{7/} *Id.* at 6.

^{8/} *Id.*

^{9/} The OBI's assumptions are fully detailed in Appendices A-D of the *Broadband Network Cost Model*.

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June 3, 2010
Page Three

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