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

In the Matter of

INCREASING PUBLIC SAFETY INTEROPERABILITY BY PROMOTING COMPETITION FOR PUBLIC SAFETY COMMUNICATIONS TECHNOLOGIES

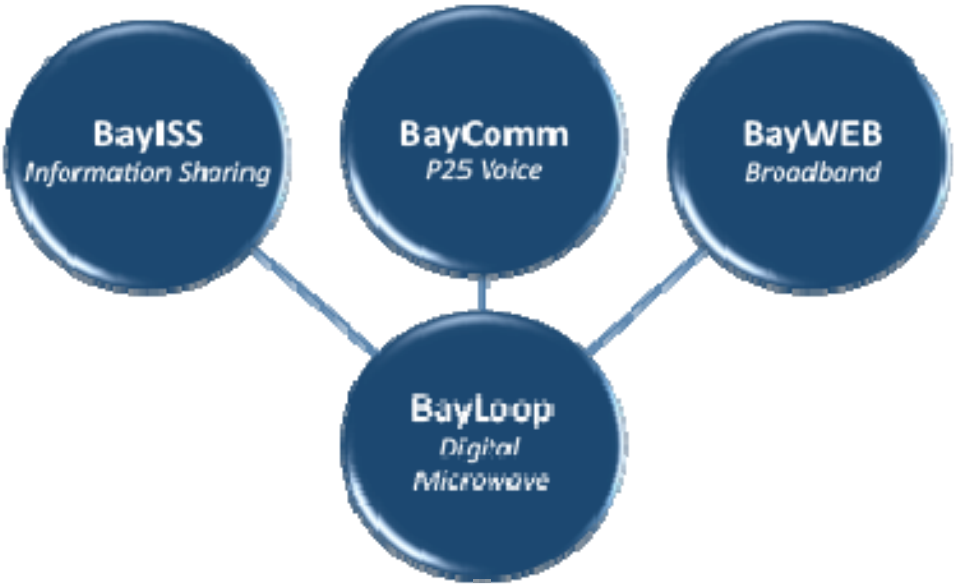
PS Docket No. 10-168

COMMENTS OF THE SAN FRANCISCO BAY AREA UASI

I. Introduction

Homeland Security is the coordinated effort to ensure we are prepared to prevent, protect against, respond to and recover from acts of terrorism and other man-made or natural catastrophes. It requires a risk management process in order to ensure we have the right capabilities in place to manage those hazards that pose the greatest risk to the region, its people, and its critical infrastructure and key resources. The threat of catastrophic events, both natural and man-made, requires continuous attention and strategic commitment from all levels of government, the private sector and the general public. The San Francisco Bay Area UASI is committed to this effort. Working together, the entire Bay Area UASI has strived to integrate preparedness activities, especially preparedness planning at the strategic level. This homeland security strategic plan represents the latest effort in that regard.

BayRICS is a state of the art communications system-of-systems comprised of four major components:



BayRICS will provide first responders with mission critical interoperable communications, enabling them to proactively respond and recover more efficiently and effectively to major intentional or natural events.

The San Francisco Bay Area's response to FCC Questions

1. **What are the factors that affect the current state of competition in the provision of public safety communications equipment? Are there any additional barriers to additional manufacturers supplying network equipment to the public safety community for narrowband communications? For broadband communications?**

With the amount of spectrum available to Public Safety, along with exponential need for growth, trunking has become essential for the efficient use of spectrum in today's Public Safety communication systems. Unfortunately, the lack of any trunking standard until recent years has allowed any manufacturer to build to their own proprietary design. Although the P25 standard has allowed, through the Common Air Interface, the ability of any manufacturer to build subscriber units that will work on any P25 system, the extremely slow progress of the development of the rest of the standard has allowed the manufacturers to design systems that are still proprietary in nature. Until all aspects of the P25 standard are completed, there will be a lack of competition among manufacturers for infrastructure equipment.

Public Safety demands quality equipment due to the inherent danger associated with the profession. The radio and its associated system must perform flawlessly in time of need. The ability to supply quality equipment, or the perception therein, has fallen to a few large manufacturers. Real or not, until other vendors supply equipment that is recognized as fail safe, the vast majority of Public Safety equipment will be supplied by a small group of large manufacturers

Due to a relative small market, the ability of manufacturers of Public Safety equipment to recoup costs associated with the design, testing and marketing is extremely difficult. Until subscriber units can be built that have a more widespread market, it's unlikely that more manufacturers will cross that barrier.

Unlike narrowband equipment standard which has been driven by Public Safety, the broadband standard has been driven by vendors and as such, an almost fully developed standard is available today, LTE. As long as this standard is adhered to, competition among vendors will remain high.

2. **How would additional competition in the provision of public safety communications equipment improve narrowband or broadband interoperability? Conversely, what impact does the current state of competition in the provision of public safety communications equipment and devices have on interoperability? Assuming additional competition would benefit public safety interoperability, what actions could the Commission take to improve competition in the provision of public safety communications equipment?**

It won't. Although additional competition will eventually drive the costs of equipment down, true interoperability comes from the adherence to a standard, P25 or LTE. The worst thing the FCC could do is allow another standard into the Public Safety marketplace. Having another standard that manufacturers could build to ie; Tetra will only exacerbate existing interoperability problems.

The current state of competition is dependent largely upon adherence to the P25 standard. As stated above, the slow development of that standard has hindered interoperability. Of the eight interfaces in the suite of P25, only 2 have been finalized, and this after almost 20 years of development.

The Commission should be cognizant of the fact that contiguous spectrum increases interoperability. The Commission has piecemealed spectrum to Public Safety over the years, and with it, has caused a decrease in interoperability due to the high cost of radios that span non-contiguous spectrum. It's generally agreed that PTT over broadband will be a reality within 10 years and narrowband radios will slowly become obsolete. If Public Safety has the D Block, along with the spectrum currently licensed to the PSST, all Public Safety could migrate to that spectrum for voice and data thereby enabling real interoperability among all Public Safety users. Contiguous spectrum and a finalized standard will lead to true interoperability.

3. What are the limitations of Project 25 in promoting narrowband public safety communications interoperability? What actions, if any, should the Commission take to rectify these limitations?

The slow development of the standard.

4. Could open standards for public safety equipment increase competition? What actions could the Commission take to facilitate openness?

No

5.As the Commission considers requirements for the 700 MHz broadband public safety network, are there any requirements on public safety equipment or network operators that would increase competition in the provision of public safety equipment? How can the Commission's work on requirements for the 700 MHz broadband public safety network be leveraged to promote interoperability between narrowband and broadband networks?

NA

Respectfully submitted,

The San Francisco Bay Area UASI

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September 19, 2010