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

In the Matter of:	)	
	)	
Public-safety and Homeland Security	)	PS Docket No. 10-168
Bureau Seeks Comment on Increasing	)	
Public-safety Interoperability by	)	
Promoting Competition for Public-safety	)	
Communications Technologies	)	

COMMENTS OF RELM Wireless

RELM Wireless is an American Manufacturer of high specification two way communications equipment for use by public-safety professionals and government agencies. RELM products include digital two way radios compliant with APCO Project 25 specifications.

SUMMARY

RELM Wireless respectfully submits the following comments in response to the Commission's inquiry seeking comments on increasing public-safety interoperability by promoting competition for public-safety technologies.

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?

The current state of competition in public-safety communication is driven primarily by competitive marketing of one dominant company (Motorola) and end-user procurement practices of equipment; not by P25 radio standards.

The misconception among public-safety equipment end users that P25 is not a complete or open standard leads to a significant number of unjustified limited-source procurement actions, which can limit or eliminate additional manufacturers from participating. As a small business manufacturer of P25 subscriber equipment, RELM Wireless expends a considerable amount of time and resources countering these limited-source procurement actions.

Incumbent system manufacturers often require public-safety end-users to include non-standard, proprietary legacy feature sets in order to operate on P25 Standards based systems. This furthers the misconception that network equipment designed to P25 open standards is not truly open and that equipment available from only a limited number of suppliers can operate on a P25 system.

Large manufacturers of P25 network equipment, such as Motorola and Harris, often restrict independently owned radio dealers or service shops from offering or servicing subscriber radio equipment of a competing manufacturer. This, in many cases, substantially restricts distribution channels and adversely impacts local product support.

Some P25 radio manufacturers have introduced non-standard options that are outside of the P25 Standard. While the P25 Standard has always envisioned the ability for a manufacturer to offer value-added features, end-users are not adequately informed that these features will negatively impact competitive procurements and are potential obstacles to interoperability.

All of these issues impacting competition notwithstanding, competition has effectively driven prices substantially lower. In 2003 when RELM Wireless introduced its first P25 subscriber radio, average selling prices for P25 radios ranged from $3,000.00 to $5,000.00 per unit. Today, comparable P25 subscriber radios are consistently priced below $1000.00 per unit.

2. How would additional competition in the provision of public-safety communications equipment improve narrowband or broadband interoperability? Conversely, what impact does the 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 FCC take to improve competition in the provision of public-safety communications equipment?

Additional competition is not required to improve narrowband interoperability. as evidenced in a presentation by the Chairman of the Project 25 Technology Interest Group (PTIG) at this year's APCO Conference; "Project 25 – A User's Perspective". Improved interoperability will result when public-safety end-users procurements require the use of standards-based feature sets, which will result in truly open source procurements.

The FCC should move to prohibit use of spectrally inefficient and/or non-standard based legacy feature sets (e.g. MDC-1200, GE-Star, FleetSync, Smartnet/Smartzone and EDACS) on public-safety pool licensed frequencies. These outdated legacy features and non-P25 technology are widely used to reduce, and sometimes eliminate, competition. The FCC should also consider a prohibition on public-safety pool licensees from operating non-P25 technology (e.g. TETRA, Mototurbo and NXDN).

3. What are the limitations of P25 in promoting narrowband public-safety communications interoperability? What actions, if any, should the commission take to rectify these limitations?

P25 provides the necessary feature set to address interoperability for public-safety communications. The FCC should openly endorse and promote Project 25 as an open standard. Further, the FCC should move to require public-safety licensees to deploy only P25 equipment on public-safety pool licensed frequencies. Only then will the jurisdictional issues inhibiting interoperability be eliminated.

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

P25 is an open standard. The single greatest action the FCC could take to increase competition for public-safety equipment would be to publicly embrace and support P25 as an open standard rather than continue the unfounded public criticism of the standard.

5. As the FCC 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?

Public-safety equipment users require more rugged and reliable products and services relative to commercial users. Public-safety also requires priority of service options not generally critical to commercial end users. These requirements will impact the competitive marketplace by increasing costs and reducing the number of competitive providers of public-safety grade equipment. To the extent possible, the 700 MHz broadband public-safety network should be required to comply with the Project 25 standard. For example, the broadband public-safety network should support P25 Console, Fixed Station and Inter-Subsystem Interfaces.

Respectfully Submitted,
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