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

In the Matter of:	)	
	)	
Increasing Public Safety Interoperability By Promoting Competition For Public Safety Communications	)	PS Docket No. 10-168

To: The Commission

COMMENTS OF PLANTCML

Plant Equipment, Inc. d/b/a PlantCML, an EADS North America Company ("PlantCML") hereby submits comments to the Federal Communications Commission (Commission) in the above-captioned proceeding.[1] PlantCML appreciates the opportunity to discuss the current competitive nature of the narrowband public safety market and future competition in the broadband public safety market.

A pioneer and trusted leader in mission critical communications, PlantCML provides key technologies for public safety, Federal/DoD and corporate markets globally. Our full-circle security and communications portfolio includes IP-enabled call center applications for CAD, mapping and information management, as well as notification solutions and services, emergency notification systems and P25 Land Mobile Radio networks. These PlantCML offerings and others are resident in 14 of the 20 most populous US cities, 250+ military operations and internationally in 15 countries.

[1] In the Matter of Increasing Public Safety Interoperability By Promoting Competition For Public Safety Communications, PS Docket No. 10-168 (rel. Aug. 19, 2010) (Interoperability Competition PN).

SUMMARY

Interoperability of digital Private Land Mobile Radio Systems (PLMRS) depends on industry consensus standards, particularly the Telecommunications Industry Association (TIA) 102 series of digital PLMRS standards that codify into radio protocol standards documents the user requirements known as APCO Project 25. A common set of standards allows new entrants such as PlantCML to offer interoperable Project 25 networks and devices. PlantCML emphasizes the importance of the 102 series of standards in providing sufficient clarity to achieve true P25 interoperability with other P25 suppliers, particularly user terminals and handsets. Since 2006, PlantCML has been successful in leveraging the Project 25/TIA 102 protocol documents into U.S. market validated solutions with no significant changes to the 102 specifications. PlantCML has invested significant resources to improve and expand the current TIA 102 series of standards, in addition to contributing to the development of the P25 Compliance Assessment Program support documents. PlantCML notes that many of the issues and concerns that arise regarding perception of P25 interoperability are actually due to features that are not Project 25 (not codified in the standards).

PLANTCML RESPONSES TO FCC REQUEST FOR COMMENTS

I. 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?

PlantCML comments that the current state of competition for provision of public safety communications equipment is affected by several key factors:

- Market opportunity – It is well understood that average public safety radio systems turnover is approximately 15 years providing a stable market dynamic. The digitization and narrowbanding (25 kHz to 12.5 kHz channels or equivalency below 512 MHz) of public safety networks, which has been underway for the past 15 years, is enhancing this traditional market driver. Additionally the next round of narrowbanding (12.5 kHz to 6.25 kHz channels or equivalency below 512 MHz) planning and standardization is underway.

- Availability of open standards – An open standard such as the Project 25/TIA 102 (Telecommunications Industry Association Project 25 standards suite) improves opportunities for new entrants to the market with the assurance that there will be a common air interface and a baseline set of features to guide the design and deployment of interoperable networks. Contrary to popular opinion, the current discussions of Project 25 interoperability issues concern non-Project 25 features which are outside of the "baseline" features defined by the standard. The availability of an open standard common air interface ensures availability of user devices from a variety of manufacturers, promoting choice and competition.
- Availability of funds to purchase a new system – Directly coupled to average age and turnover of a public safety radio system, funding for public safety networks is achieved via a percentage of local taxes and/or municipal bonds. Taxes and bonds have long periods of repayment which contribute to the average age and turnover.
- Availability of spectrum – In the case of the radio markets, the level of competition is affected by the availability of spectrum. Limited spectrum implies a limited market space and can affect the decision of a manufacturer to enter that space. Current public safety narrowband spectrum coupled with two efforts of further narrowbanding (25 kHz to 12,5 kHz to 6.25 kHz channels or equivalency) provides a broad market space and enables competition.

PlantCML notes that since 2006, the number of P25 compatible manufacturers has increased by 20%, based on a review of current membership in the Project 25 Technology Interest Group (www.project25.org). This increase is largely in part due to

the comprehensive set of TIA 102 standards specifications (narrowband) that allow new participants to enter the market space. PlantCML views open standards as minimizing any barriers to entering the public safety market, regardless of whether the discussion is about narrowband or broadband market spaces and spectrum.

At this time PlantCML also sees no serious barriers for entry into the new 700 MHz public safety broadband market space, as evidenced by the multiple alliances announced in the few months since the FCC provided waivers and interim rulings to allow operation of LTE Release 8, with conditions, in the current 700 MHz public safety broadband spectrum. It is unlikely that all these entities would make the investments if there were no viable business case and a sufficient set of standards to use for guidance (e.g. LTE rel 8 and Project 25).

II. 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?

PlantCML offers no further comment regarding additional competition since new competitors have been entering the narrowband and broadband market spaces continuously since 2006.

The availability of open standards such as the TIA 102 series of documents promotes competition and again this has been proven by the number of entrants offering Project 25/TIA 102 compatible equipment. With the introduction of the P25 Compliance Assessment Program, PlantCML has seen and participated in the CAP program and has not witnessed any failures of those companies choosing to test to the CAP documentation.

The FCC can improve competition by ensuring federal funding for state and municipal radio enhancement/rebuild programs only utilize the TIA 102 standards documents and the features contained therein. Congressional initiatives, such as the recent legislation introduced by Rep. Jane Harman, HR 5907, "Next General of Public Safety Device Act of 2010", can and will spur innovation and competition in the development of next generation mobile communications devices that will provide the highest-speed transmission of data, voice and video services over the Internet. This legislation authorizes a $70 million grant competition to encourage manufacturers to "develop and build prototype mission critical voice and data-capable handsets and vehicle-portable devices for the 700 MHz spectrum."

III. 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.

IV. COULD OPEN STANDARDS FOR PUBLIC SAFETY EQUIPMENT INCREASE COMPETITION? WHAT ACTIONS COULD THE COMMISSION TAKE TO FACILITATE OPENNESS.

PlantCML feels the Commission can minimize limitations in promoting public safety narrowband interoperability as long as the consensus standards such as the TIA 102

series of documents and the features contained therein are adhered to. Common adoption of open standards fosters interoperability. And as stated previously, the FCC can improve competition by ensuring federal funding for state and municipal radio enhancement/ rebuild programs only utilize the TIA 102 standards documents and only the features contained therein. PlantCML supports any course of actions the Commission takes in endorsing a common set of consensus based open standards for public safety spectrum.

V. 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.

PlantCML endorses the Commission's current course of action in developing the standards to support public safety broadband. The creation of the FCC ERIC PSAC (nominations in process) which includes "representatives of state and local public safety agencies, public safety trade associations, federal user groups, and other segments of the public safety community, as well as service providers, equipment vendors and other industry segments" is a step in the right direction. Inclusion of the stakeholders is an important part of the process to ensure all voices are heard and promotes consensus standards and most importantly adherence to those consensus standards.

PlantCML comments that a radio market space and thus competition in that space is determined by availability of spectrum.

PlantCML encourages the FCC to find additional spectrum to serve the broadband needs of public safety. Broadband spectrum is required for both jurisdictional (served by the current public safety 700 MHz broadband spectrum) and incident area operations (required broadband for "local area" operations).

CONCLUSION

For the foregoing reasons, PlantCML urges the Commission to take into consideration its views on public safety interoperability.

Respectfully submitted,

PLANTCML

By: ___/s/_____

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