

Dear FCC: The Project 25 Technology Interest Group response to the FCC Public Notice on Competition in Public Safety Communications technology includes the following six optimistic statements.

\* "Project 25 has been designed specifically to enable interoperability and increase competition in the public safety communications marketplace... there are... Seven manufacturers providing console equipment."

\* "This leaves the bidding for subscriber equipment wide open to a growing number of bidders that choose to market Project 25 equipment products, expanding customer choice, and encouraging price competition."

\* "Project 25 Compliance Assessment Program ... will soon address other interfaces, features and functions within the P25 suite once those tests are approved and published."

\* "2010 Grant Guidance ... DHS has mandated that ... All new digital voice systems must be compliant with Project 25 (P25) suite of standards."

\* "the number of manufacturers that have participated in the process, and brought P25 product to the market... includes providers of ... console equipment."

\* "... the publication of the Project 25 Standards and the implementation of products supporting these standards have significantly enhanced the competitive market environment. As older systems are replaced with new Project 25 Systems the requirement for legacy proprietary capabilities will decrease and minimize the need for limited source acquisitions."

The above statements may be not be incorrect.

However, from my perspective as the program manager for over six years overseeing acquisition of Wyoming's shared P25 public safety radio system, the picture is not so optimistic. WY public safety communications planning envisioned competition in the console equipment market, always assuming that the necessary P25 standards will mature. Now the protocol aspect of the Console Subsystem Interface (CSSI) standard is done, but P25 compliance certification test standards aren't locked down. I am not closely involved in that standards-making group, but progress on these compliance assessment standards is imperceptible to me.

I would anticipate that practical (though necessarily informal) testing would be possible in advance of the published P25 CSSI compliance standards, as it was for over-the-air subscriber equipment.

Wyoming is asking our vendor to offer a P25 compliant CSSI that our budget process could consider. However, the major vendor who provided our P25 system infrastructure has a sole-source lock on wireline consoles that may be connected to our system. They have announced the phase-out of support for some console equipment just implemented by several WY agencies this year; and yet prospects for competition between wireline console vendors remain remote. Our vendor has been unresponsive to requests to offer, or to estimate a date they might offer, a CSSI that would allow other vendors to offer products that could operate on our newly purchased statewide system. Our vendor has been unresponsive to our requests to cooperate in WY with another prominent console manufacturer to prototype a CSSI compliant interface.

I applaud FCC's efforts to better leverage open standards for public safety equipment to increase competition and interoperability, particularly in the public safety radio wireline console market. Thank you for your efforts in this area.

Robert Wilson  
Telecom Program Manager  
Wyoming Department of Transportation