



The Voice of Rural & Regional Carriers

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January 13, 2011

**Via ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: PS Docket No. 06-229**

Dear Ms. Dortch:

On January 12, 2011, RCA CEO & President Steven Berry, RCA Director of Legislative Affairs Tim Donovan, and the undersigned met with Public Safety and Homeland Security Bureau (PSHSB) Chief James Barnett and PSHSB Deputy Chief Jennifer Manner to discuss the Commission's proposed Interoperability Order and Further Notice of Proposed Rulemaking (FNPRM).

With the potential of an Interoperability Order and FNPRM to be address at the FCC's January 25<sup>th</sup> Open Meeting,<sup>1</sup> RCA discussed the importance of interoperability, the ability of Public Safety to roam on commercial networks and vice versa, in addition to intra-operability, the ability of Public Safety to talk to each other on networks deployed in the Public Safety spectrum. As a September 4, 2009 National Public Safety Telecommunications Council (NPSTC) report concluded, interoperability with commercial networks is essential to the deployment of a 4G Public Safety network.<sup>2</sup> Interoperability will bring many benefits to the Public Safety community including redundancy, network roaming, improved quality of service, and reduced equipment costs.

Interoperability throughout the 700 MHz band is crucial for both Public Safety and consumers to reap the economic benefits of roaming and access to the latest handsets. Device flexibility and interoperability in the 700 MHz band will allow Public Safety and consumers to enjoy economies of scale from the entire 700 MHz Long Term Evolution (LTE) ecosystem by increasing handset competition while decreasing costs. In fact, the Congressional Research Service estimates that an interoperability requirement would lower the average cost of Public Safety devices by \$2500, to just \$500

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<sup>1</sup> *FCC Announces Tentative Agenda for January 25<sup>th</sup> Open Meeting*, Public Notice (Jan. 4, 2011).

<sup>2</sup> In exclusively commercial mobile networks, roaming is an essential capability for providing users with the experience of national connectivity. Even after 25 years of development and tens of billions of dollars of investment, no single terrestrial mobile service provider in the United States can provide a truly national footprint to its customers without relying on roaming services from other operators. A nationwide, interoperable wireless broadband network, referred to here as the National Broadband Data System (NBDS) for public safety will not be built overnight and it will take many years to even approximate ubiquitous coverage. During that period, the ability of public safety users to roam on commercial networks will be essential. *National Public Safety Telecommunications Council, 700 MHz Public Safety Broadband Task Force Report and Recommendations* at 32-33 (Sept. 4, 2009).

per device.<sup>3</sup> Interoperability also will improve service, especially in rural areas, with greater coverage and the technical capability for nationwide seamless roaming for both voice and data wherever LTE networks are deployed. For example, when the Public Safety network is unavailable due to an outage or capacity limitations, Public Safety would have access to multiple redundant 700 MHz networks that also use LTE technology, as described in the National Broadband Plan.<sup>4</sup>

Without interoperability Public Safety will be prevented from accessing mobile broadband capabilities on networks other than their own due to the balkanized 700 MHz spectrum, Public Safety will continue to over pay for network devices, and the two largest wireless carriers will control who can provide nationwide services to consumers. Further, lack of interoperability in the 700 MHz band will impose significant costs and burdens upon Lower A Block licensees which will competitively disadvantage smaller and regional carriers, Public Safety and consumers.

RCA encouraged the PSHSB to continue to pursue the FCC's recommendation in the National Broadband Plan to explore other ways to encourage the deployment of public safety devices that transmit across the entire broadband portion of the 700 MHz band.<sup>5</sup> RCA looks forward to addressing these issues in the PSHSB's forthcoming FNPRM.

This *ex parte* notification is being filed electronically with your office pursuant to Section 1.1206 of the Commission's Rules.

Sincerely,



Rebecca Murphy Thompson  
General Counsel

cc: Chief James Barnett  
Jennifer Manner

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<sup>3</sup> Linda K. Moore, *Public Safety Communications and Spectrum Resources: Policy Issues for Congress*, Congressional Research Service, Sept. 1, 2010, at 8.

<sup>4</sup> Omnibus Broadband Initiative, FCC, CONNECTING AMERICA: THE NATIONAL BROADBAND PLAN at 316 (Mar. 16, 2010).

<sup>5</sup> *Id.* at 314-316.