



The Competitive Carriers Association

Rural Cellular Association

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The Honorable Fred Upton
Chairman, House Energy & Commerce Committee
2183 Rayburn House Office Building
Washington, DC, 20515

Dear Chairman Upton:

On behalf of RCA and its members, I would like to thank you and extend our support for your continued scrutiny of the public safety equipment and device market. As commercial and public safety communications focus on deploying LTE networks in the 700 MHz band, there is great potential for synergy and for the public safety community to leverage the investments, innovation, and economies of scale of commercial markets. Unfortunately, without interoperability across all 700 MHz broadband spectrum, this potential will not be realized.

For the first time, both commercial wireless carriers and public safety network operators are deploying the same air interface on the same spectrum band – LTE in the 700 MHz. Unfortunately, and also for the first time, interoperability is not present within a given spectrum band among those using the same air interface. This lack of interoperability creates an unnecessary technical barrier to shared equipment ecosystems and partnerships. There is simply no logical reason why public safety should not have the ability to access commercial networks in a crisis. Congress cannot afford to fund a public safety network that is not interoperable with commercial services.

RCA strongly encourages Congress and/or the Federal Communications Commission to reverse this unfortunate path and act to support interoperability across the 700 MHz band and within future spectrum made available for mobile broadband use. Interoperability will increase competition in devices and equipment for both commercial and public safety users while also providing additional partnership potential and support for roaming across the band.

Regarding your April 20, 2011 letter to FCC Chairman Genachowski, interoperability throughout the 700 MHz will go a long way to help solve the problems addressed in questions 3 and 4. Interoperability will:

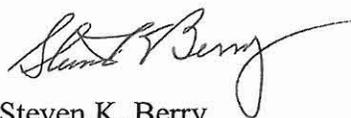
- Ensure that equipment supplied by public safety vendors will conform with commercial LTE standards.
- Reduce costs by approximately \$2500 per unit for public safety devices¹, reducing the gap between costs for commercial LTE devices and public safety LTE devices.

¹ See, e.g., L. Moore, "Public Safety Communications and Spectrum Resources: Policy Issues for Congress," Congressional Research Service Doc. No. R40859 (September 1, 2010) ("The participation of commercial carriers in developing and deploying, for example, a common radio interface, is expected to put the costs of public safety radios in the same price range as commercial high-end devices (\$500). By contrast, interoperable radios for the narrowband networks at 700 MHz cost \$3000 and up, each.")

- Increase the economies of scale for both commercial and public safety devices, reducing equipment costs across both markets.
- Support the immediate use of innovate commercial LTE products on public safety LTE networks and provide the technical components to foster innovation in the public safety device market, building upon advances in the commercial device market.
- Provide for devices in terminated lines to remain compatible with newer devices.
- Promote partnerships between commercial and public safety networks and allow public safety users to roam onto commercial networks, a capability not currently present but long supported by the public safety community².
- Enhance competition in the public safety marketplace, and allow public safety users to benefit from existing competition in the commercial device market.

RCA and our nearly 100 smaller competitive carriers across the United States fully support embracing interoperability in the 700 MHz spectrum and with all future spectrum made available for mobile broadband. Please do not hesitate to contact me with questions, and please let me know if RCA can be of further assistance.

Regards,



Steven K. Berry
President & CEO, RCA

² See, e.g., National Public Safety Telecommunications Council Report "700 MHz Public Safety Broadband Task Force Report and Recommendations" (September 4, 2009)("A nationwide, interoperable wireless broadband network ... 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.")(32)