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May 6, 2011

Robert L. Pettit
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Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW,
Room TW-A325
Washington, DC 20554

Re: Notice of written *ex parte* presentation
PS Docket No. 06-229

Dear Ms. Dortch:

On behalf of Motorola Solutions, Inc., please include the attached *ex parte* presentation into the public file for PS Docket No. 06-229.

Sincerely,

/s/ Robert L. Pettit

Robert L. Pettit
Counsel to Motorola Solutions, Inc.

cc:

The Honorable Julius Genachowski, Chairman
The Honorable Michael J. Copps, Commissioner
The Honorable Robert M. McDowell, Commissioner
The Honorable Mignon Clyburn, Commissioner
The Honorable Meredith Attwell Baker, Commissioner
James Arden Barnett, Jr., Chief, Public Safety and Homeland Security Bureau

Motorola Solutions, Inc.
1455 Pennsylvania Avenue, NW
Suite 900
Washington, DC 20004

May 5, 2011

The Honorable Julius Genachowski
Chairman
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Dear Chairman Genachowski:

Earlier today, Motorola Solutions, Inc. delivered the enclosed letter and attachment to the Chairmen and ranking members of the Energy and Commerce Committee of the United States House of Representatives. In the letter, Motorola Solutions reiterated its commitment to developing and delivering the highest quality communications equipment and devices to the public safety community.

Motorola Solutions also restated its commitment to standards and interoperability and recognized the importance of bringing state-of-the-art broadband solutions to public safety in a cost-effective manner. As stated in the attached letter, Motorola Solutions looks forward to working with Congress and the Commission on this important issue going forward. Finally, in the attachment, Motorola Solutions provided additional detailed information in response to the specific questions asked to you by the Chairmen and ranking members in their letter of April 20, 2011.

Pursuant to Section 1206(b) of the Commission's rules, a copy of this letter will be submitted into the record in PS Docket Number 06-229.

Respectfully,



Karen P. Tandy
Senior Vice President
Public Affairs

Enclosure

cc: The Honorable Michael J. Copps, Commissioner
The Honorable Robert M. McDowell, Commissioner
The Honorable Mignon Clyburn, Commissioner
The Honorable Meredith Attwell Baker, Commissioner
James Arden Barnett, Jr., Chief, Public Safety and Homeland Security Bureau

Motorola Solutions, Inc.
1455 Pennsylvania Avenue, NW
Suite 900
Washington, DC 20004

May 5, 2011

The Honorable Fred Upton
Chairman
Committee on Energy and Commerce
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Henry Waxman
Ranking Member
Committee on Energy and Commerce
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Greg Walden
Chairman
Subcommittee on Communications and
Technology
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Anna Eshoo
Ranking Member
Subcommittee on Communications and
Technology
U.S. House of Representatives
Washington, D.C. 20515

Dear Chairmen Upton and Walden and Ranking Members Waxman and Eshoo:

Your letter of April 20, 2011 to Chairman Genachowski raised concerns about the marketplace for public safety equipment and devices and whether the current structure will hinder efforts to achieve interoperability. In light of your concerns and the specific questions that you have raised about Motorola Solutions (Motorola), we appreciate the opportunity to correct some misinformation and provide you and Chairman Genachowski with our perspective.

Unlike any other competitor in the marketplace, Motorola has served public safety continuously for the past 80 years, and the company is proud of this history. While other vendors have come and gone, Motorola has remained committed to the marketplace and has closely listened to public safety's needs. It goes without question that over decades, Motorola has provided public safety with reliable, state-of-the-art equipment and innovative solutions. Motorola does not manufacture or sell any proprietary public safety networks.

The public safety market is highly competitive. Their P25 mission critical radio systems -- the industry approved open standard for public safety voice communications -- are now provided by more than 12 vendors. Motorola recognizes this market reality and, indeed, shares your desire to ensure a robust competitive marketplace that can bring state-of-the-art, interoperable services, including broadband, to public safety in a cost-effective manner. That is why Motorola has committed significant resources to assist industry efforts to embrace non-proprietary, open standards, for example:

- Motorola provides a significant amount of essential P25 open standard intellectual property to other vendors royalty free.

- Motorola contributes 45 engineers to support the P25 open standard at no cost.
- Motorola invested millions of dollars in establishing test labs that we make available to other vendors at no charge, for certifying interoperability.
- Motorola is also proud to have been a part of the tremendous progress that has been made on interoperable communications. Nearly 70% of the country has P25 coverage over a patchwork of spectrum, with localities across the US continually phasing out older proprietary systems and replacing them with P25 open standard technology. That progress is well illustrated by the aftermath to the Minneapolis bridge collapse where more than 50 federal, state and local government agencies interoperated on the open standards-based P25 network during emergency conditions. In their 2007 report on the incident, FEMA even cited communications during this incident as a key best practice.

Motorola is fully committed to the development of interoperable broadband technology, and our broadband offerings are fully compliant with the 3GPP LTE interoperability standards. Along with 370 industry and government entities from around the world, Motorola is engaged in the 3GPP LTE standards-setting process, and we will continue to comply as standards evolve. Motorola is starting on common ground with our competitors and is actively competing to help public safety realize its vision to have a truly interoperable nationwide broadband network. Motorola welcomes the opportunity to compete in this standards based environment which will lead to innovative solutions for public safety.

Regarding your questions about contracts already awarded for early deployment of public safety broadband (LTE) networks, there are no completed public safety LTE deployments. Numerous locales are at different points in the acquisition/deployment cycle with multiple vendors vying for business in this nascent field. Of the 52 pending or approved waivers at the FCC for broadband in the existing 700 MHz public safety spectrum, Motorola has been selected for only two. In both cases, all local procurement requirements and laws were adhered to by Motorola.

You have posed a number of specific questions to the FCC, and while we do not presume to answer for the Commission, we would appreciate the opportunity to give you our perspective on those specific inquiries, based on our best information. This is attached in a separate document.

We are committed to public safety – as we have been for 80 years. We look forward to working with you and the Commission to further realize our shared vision of a competitive market providing innovative solutions for public safety communications.

Respectfully,



Karen P. Tandy
Senior Vice President
Public Affairs

Enclosure

cc: The Honorable Julius Genachowski
Chairman, Federal Communications Commission

Motorola Response to House Energy and Commerce Committee letter to
FCC Chairman Genachowski (dated April 20, 2011)

Responses to Specific Questions in the Committee's April 20, 2011 Letter

1. Please provide a list of waiver recipients and applicants that have already selected a vendor, and identify the vendor.

The Commission has granted 21 conditional waivers for deployment on the existing 700 MHz band public safety broadband spectrum. Twenty of those waivers remain in force and there are 32 additional waivers pending action at the Commission. Motorola has been selected as the vendor of choice in 2 of these 52 opportunities.

Note that these waiver grants and pending requests for early deployment all relate to use of the existing public safety broadband spectrum. They do not involve the use of the D block spectrum.

2. Please indicate whether these jurisdictions followed a competitive bidding process in the selection of the vendor that is to construct the broadband public safety network.

In each procurement situation in which Motorola Solutions has competed, Motorola Solutions has followed all relevant procurement regulations.

3. Is this vendor(s) supplying equipment that conforms with open, commercial LTE standards?

Motorola's LTE offering conforms to open, commercial LTE standards. FCC Waiver Orders regarding the establishment of 700 MHz Interoperable Public Safety Wireless Broadband Networks require deployed equipment to comply with the open LTE standard interfaces developed by 3GPP and recently incorporated this requirement into the rules as well. These are the same LTE standards that are being used by commercial broadband operators in the 700 MHz band.

4. In addition to LTE, please indicate whether these vendors intend to implement proprietary broadband wireless technologies. If so, how would such proprietary technologies impact:

Motorola's LTE equipment complies with the LTE standard and therefore is not a proprietary technology. As stated, the following questions assume proprietary technologies are being provided by vendors. Even though Motorola is not providing proprietary LTE technologies, in an effort to provide helpful information, our responses are below.

a. network and device equipment costs borne by public safety relative to commercial equipment;

Motorola is developing network and device equipment which incorporate hardware and software components which have been developed for, and are being distributed into, the LTE commercial carrier market which is LTE standards based. This approach provides customers with the advantages of economies of scale and R&D amortization over the LTE commercial carrier market.

b. the ability for public safety to benefit from innovation in wireless technologies;

LTE represents the state-of-the-art in wireless broadband technology. LTE innovation is fueled by global investment and competition in the commercial wireless market. By adopting LTE technology for public safety and by requiring compliance to LTE standards, public safety will receive the benefit of state-of-the-art wireless technology.

c. the likelihood of terminated product lines or new mandatory releases that result in unique costs to public safety relative to commercial technologies;

Commercial wireless providers around the world are investing the equivalent of billions of dollars each year in the development and deployment of LTE technology. This level of commitment and investment is driving a vast ecosystem of suppliers, products, and system integrators. While technology advances rapidly, adoption and deployment of the technology will vary significantly. As an example, the GSM technology was invented over 20 years ago, however the market and availability of GSM network infrastructure and mobile phones is still thriving today. A similar longevity should be expected of the LTE technology.

d. public safety interoperability at the application, device, and network levels among networks provisioned by different vendors;

The standard LTE technology enables all authorized devices and users of the network to access applications offered by their home service provider, both in their home network and in visited networks while roaming. As long as vendors comply with standards based technology, a multi-vendor network can be constructed which enables home service provider applications and devices to be accessed in their home network as well as in visited networks. The standard LTE technology also enables authorized devices and users to access applications offered by visited service providers while roaming. This type of application accessibility requires much more provisioning coordination among the home service providers; however it is enabled by the standard technology. The products offered by Motorola will comply with these aspects of the standard LTE technology, and thus will support public safety interoperability at the application, device, and network levels among networks provisioned by different vendors.

e. the ability of public safety users to enter into partnerships with commercial wireless providers;

The standard LTE technology enables multilateral partnerships with commercial wireless providers. Examples include roaming partnerships, radio access network sharing partnerships, and core network sharing partnerships. Each type of partnership carries tradeoffs associated with capital expenditures, operational expenditures, and autonomy in the network design, construction, operations, and maintenance.

Products offered by Motorola will support LTE roaming onto a commercial carrier network. In addition, Motorola is working with a commercial operator that will provide public safety customers a choice in choosing a public carrier for service and having access to public safety applications or owning their network with the ability to leverage existing carrier sites as well as the ability to roam onto the carrier's network. Additional commercial wireless partnership options are able to be supported as required by the public safety community. The products offered by Motorola will support the ability of public safety users to enter into partnerships with commercial wireless providers across the country.

f. competition in the public safety communications equipment market; and,

The public safety communications equipment market is vibrant and competitive. Adoption of LTE technology has attracted a number of equipment suppliers, system integrators, and service providers from the commercial wireless market. These vendors and providers recognize that the common LTE technology can leverage investments made for the commercial wireless market. As such, competition in the public safety communications equipment market will increase as the LTE technology ecosystem matures and expands.

g. the FCC's National Broadband Plan finding that encouraging incentive-based partnerships with a variety of commercial operators would benefit public safety.

Motorola has taken the recommendations of its public safety customers, the FCC and Congress regarding the need for such partnerships very seriously. The operators utilize multiple suppliers across their respective networks which should facilitate interoperability.

5. How would the construction of early deployed public safety networks by dominant vendors:

a. be impacted by subsequent adoption of final technical and operations rules governing 700 MHz public safety broadband networks – would the public safety agency be responsible for paying for any and all network and device changes ? ;

Motorola has agreed to partner with the early adopter jurisdictions to deliver a solution that complies with the 3GPP LTE standard, and all current and future FCC rules governing the operation of a 700 MHz broadband network. As demonstrated with Harris County and the State of Texas, Motorola has taken the unprecedented step and included such compliance with FCC rules and orders in our contract with Harris County.

b. affect achievement of a nationwide level of public safety interoperability at the device, application, and network levels?

As noted above, Motorola's public safety broadband equipment complies with the LTE standard developed by 3GPP, which is a key requirement for device and network interoperability. To provide an additional level of applications' interoperability, the public safety community has recommended that a common set of applications be established and deployed nationwide. The products offered by Motorola will support this requirement. In addition, public safety has recommended that agencies have the flexibility to deploy applications needed in their respective areas, in addition the set of nationwide applications. The products offered by Motorola will support this recommendation. For example, agencies in Michigan could deploy an application to track snow plows while agencies in Florida may have no need for that type of application. Public safety entities should have the flexibility to meet their operational needs, while still enjoying the benefits of nationwide interoperability.