

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Service Rules for the 698-746, 747-762 and 777-792 MHz Bands)	WT Docket No. 06-150
)	
Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band)	PS Docket No. 06-229
)	
Amendment of Part 90 of the Commission’s Rules)	WP Docket No. 07-100

**REPLY COMMENTS OF CASSIDIAN COMMUNICATIONS, INC.,
AN EADS NORTH AMERICA COMPANY
TO THE THIRD REPORT AND ORDER
AND FOURTH FURTHER NOTICE OF PROPOSED RULEMAKING**

Cassidian Communications, Inc., an EADS North America Company, (“Cassidian”) submits the following reply comments in response to the Third Report and Order and Forth Further Notice of Proposed Rulemaking (FNPRM) in the above captioned proceeding. Upon review of the submitted comments to date Cassidian notes several areas of consensus by 3GPP LTE infrastructure manufacturers and offers the following reply comments.

Cassidian agrees with several LTE manufacturers that the Commission should not codify all elements of LTE architecture, instead focusing on those interfaces necessary for interoperability. Cassidian urges the Commission to utilize the ERIC PSAC to explore the necessary requirements and to refer any standards issues to appropriate standards setting bodies such as ATIS. The use of existing standards bodies for standardization of LTE architecture interfaces allows these interfaces to be continually reviewed and upgraded using industry consensus process and ensures these interfaces naturally

progress in rational fashion.

Cassidian agrees with a single national PLMN ID and suggests to the Commission that regional, sub-regional, and tribal networks be allowed to independently assign IDs in a manner that supports their local requirements. It is not possible at this time to precisely predict how regional, sub-regional, and tribal core networks will deploy and codification of rules in this regard may frustrate regional, sub-regional, and tribal network architectures, requiring those entities to utilize the Commission's waiver process, which in this case would be cumbersome to all involved.

Cassidian agrees that the Commission should promote the use of open standards for transport and LTE and that proprietary elements in the proposed LTE network should be prevented. The Commission should rely on the Commission's ERIC PSAC to participate in the standards process to ensure the Commission's goals are being realized. Cassidian notes that standards alone do not prevent non-interoperable solutions from appearing as elements of applications (versus the infrastructure) and open networks alone do not preclude implementation of proprietary features.

Cassidian notes that all manufacturers of LTE infrastructure that provided input on the subject of "interconnection with Legacy Public Safety Networks" supported the use of the Project 25 Inter-RF Subsystem Interface (P25 ISSI). Cassidian wants to support this conclusion and as a leader of the P25 ISSI standards process and major contributor to the creation of the P25 ISSI TIA-102 standards suite, notes to the Commission that the original intent of the SIP and RTP based ISSI protocol was to provide an IP based interoperable gateway protocol designed in such a way to extend to wideband and broadband systems, particularly cellular architectures. The use of SIP in

the ISSI provides session setup, in-session control, and session teardown, including discovery and media management to support new services and applications as they are introduced. The current P25 ISSI RTP protocol provides low-latency PTT floor control and voice conveyance. Cassidian looks forward to further discussions with the Commission, the ERIC PSAC, and our peers on the subject of the P25 ISSI as a foundation for legacy systems interoperability.

Cassidian notes the broad support for inclusion of Federal users and Section 337 secondary use in the public safety 700 MHz spectrum and encourages the Commission to rule appropriately.

Finally, Cassidian emphasizes the need for full interoperability between the public safety broadband network and NG911 networks and as previously stated, Cassidian supports the National Emergency Number Association (NENA) i3 (Functional and Interface Standards for Next Generation 9-1-1, Standard 08-002 v1 and 08-003 v1) standard as the sole NG9-1-1 standard for the basis of the public safety broadband network.

CONCLUSION

Cassidian Communications, Inc. appreciates the opportunity to further comment on the PS Docket 06-229 Third Order and Forth Notice of Public Rulemaking and hopes the Commission will take into consideration Cassidian's views on this proceeding.

Respectfully submitted,

CASSIDIAN COMMUNICATIONS, INC.

By: ___/s/_____

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