

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of:)	
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)	
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 MOTOROLA SOLUTIONS, INC.

Motorola Solutions, Inc. (“MSI”) hereby files Reply Comments in response to the Fourth Further Notice of Proposed Rulemaking on developing, deploying, and operating a nationwide interoperable public safety broadband network.¹ MSI applauds the work of the Commission in this proceeding and is committed to transforming the vision of a nationwide network comprised of interoperable, regional or tribal systems operating in the public safety broadband spectrum into a reality.

The initial comments filed in response to the *Fourth Further Notice* demonstrated widespread agreement with the fundamental points made by MSI in its opening comments. In particular, the commenters were largely uniform in urging the Commission to develop a uniform nationwide architectural framework that will ensure interoperability while preserving flexibility in implementation. As the Association of Public-Safety Communications Officials-International

¹ See Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band, *et al.*, WT Docket No. 06-150, PS Docket No. 06-229, WP Docket No. 07-100, *Third Report and Order and Fourth Further Notice of Proposed Rulemaking*, 26 FCC Rcd 733 (2011) (“*Fourth Further Notice*”).

(APCO) explained, the Commission “should limit its rules to that which is necessary now to ensure nationwide interoperability across the network,” and it should “avoid premature adoption of rules covering operational and technical issues that have yet to be fully explored in real world environments.”²

Through these Reply Comments, MSI respectfully urges the Commission to take steps to promote the immediate deployment of public safety broadband networks in the 700 MHz public safety broadband spectrum. The Commission should accomplish this through the grant of additional waivers to enable early deployment of 700 MHz public safety broadband networks, and by moving toward carefully crafted final rules that are focused on enabling the interoperable evolution of public safety broadband networks.

MSI supports a standards-based, interoperable nationwide public safety broadband network that provides optimal local/regional control to ensure the network is responsive to local/regional operational needs. Also, a regionally distributed infrastructure would help ensure more robust physical site redundancy and disaster tolerance than a centrally-controlled, nationwide deployment. Accordingly, as detailed in our original comments, MSI believes the best model for governance of the public safety broadband network would be one that emphasizes regional, tribal, and local control over the planning and oversight of broadband deployment, while delivering nationwide interoperability.

Such a model would need to incorporate a tiered approach to governance with some national level and some regional level elements. Some aspects of central network administration and management are necessary to ensure nationwide interoperability, as well as to manage overall funding goals. This would be married together with key involvement of regional public

² See Comments of the Association of Public-safety Communications Officers, PS Docket No. 06-229 at 2 (filed Apr. 11, 2011).

safety entities in the planning, procurement, deployment and operational decisions for the network, devices, integration with existing applications, and other necessary components or features. Combined with sufficient spectrum and funding, this governance model should provide a foundation for both nationwide interoperability and the local/regional control and designs needed to ensure the broadband network meets the varied needs of public safety entities across the country.

MSI recognizes that important determinations regarding the future of the 700 MHz D Block and the governance of the nationwide network have yet to be finalized. MSI believes that securing additional mobile broadband spectrum will be essential to fulfilling the long-term communications needs of public safety. However, the ongoing deliberations should not delay initial deployment on the Public Safety Broadband Licensee (“PSBL”) spectrum block by those states, regions, tribes, and localities that have an immediate need for mission critical broadband services.

The Commission should continue to promote interoperable deployment on the public safety broadband spectrum resources that have already been secured through the grant of additional waivers for early network construction. As previously recognized by the Commission, there is a “critical public safety need for prompt deployment and access to broadband communications infrastructure that meets public safety’s needs.”³ At the same time, the Public Safety Spectrum Trust explains that “the technical and operational lessons learned from early deployments will be critical to developing the future nationwide, interoperable public safety

³ See Requests for Waiver of Various Petitioners to Allow the Establishment of 700 MHz Interoperable Public Safety Wireless Broadband Networks, PS Docket 06-229, Order, 25 FCC Rcd 5145, 5150 ¶ 15 (2010) (*Waiver Order*).

wireless broadband network.”⁴ This point is echoed by the National Public Safety Telecommunications Council, which states that “these early deployments would provide valuable insight and experience that could be leveraged as the network rolls out nationwide.”⁵

The Commission has before it over 30 requests for waiver by state or local public safety organizations seeking authority to begin broadband deployment, upon which it has not yet ruled.⁶ These waivers should be immediately addressed, and those deemed appropriate should be granted pursuant to the rules and processes set forth in the Commission’s *Waiver Order* and *Interoperability Waiver Order*.⁷ Sufficient safeguards and guidelines were adopted in those orders to ensure that the public safety broadband networks constructed pursuant to waivers are done so in a rational way that can be successfully interconnected with the nationwide network, once it develops.

In looking beyond waiver grants, the Commission should only adopt the basic requirements for interoperability at this time. Overly detailed technical rules will unnecessarily constrain the evolution of the network. MSI shares the International Municipal Signal

⁴ See Comments of the Public Safety Spectrum Trust, WT Docket No. 06-150, PS Docket No. 06-229, WP Docket No. 07-100 at 2 (filed Apr. 11, 2011).

⁵ Comments of the National Public Safety Telecommunications Council, WT Docket No. 06-150, PS Docket No. 06-229, WP Docket No. 07-100 at 5 (filed Apr. 11, 2011).

⁶ See, e.g., Public Safety and Homeland Security Bureau Seeks Comment on Petitions for Waiver to Deploy 700 MHz Public Safety Broadband Networks, PS Docket No. 06-229, *Public Notice*, 25 FCC Rcd 17306 (2010) (seeking comment on three waiver requests); Public Safety and Homeland Security Bureau Seeks Comment on Additional Petition for Waiver to Deploy 700 MHz Public Safety Broadband Network, PS Docket No. 06-229, *Public Notice*, 25 FCC Rcd 13364 (2010) (seeking comment on waiver request by the State of Texas); Public Safety and Homeland Security Bureau Seeks Comment on Petitions for Waiver to Deploy 700 MHz Public Safety Broadband Networks, PS Docket No. 06-229, *Public Notice*, 25 FCC Rcd 13155 (2010) (seeking comment on twenty-three waiver requests). There are also several waiver requests that have been filed but that have not yet placed on public notice.

⁷ See *Waiver Order*. See also, Requests for Waiver of Various Petitioners to Allow the Establishment of 700 MHz Interoperable Public Safety Wireless Broadband Networks, PS Docket 06-229, *Order*, 25 FCC Rcd 17156 (2010) (*Interoperability Waiver Order*).

Association's belief that "public safety entities need the freedom to make technical decisions regarding their networks in order to speed deployment, tailor their systems to the needs of their specific populations and geographic areas served, and comply with any budgetary restrictions."⁸

As discussions regarding the governance structure for the nationwide network proceed in other venues, the Commission should set a foundation that gives public safety the flexibility necessary to develop a robust and evolutionary broadband network within the necessary context of nationwide interoperability.

For the reasons discussed above, MSI respectfully suggests that the Commission should continue to promote immediate and efficient public safety broadband deployment in the 700 MHz band through the approval of additional public safety broadband waivers and through the adoption of limited technical rules focused on achieving the dual goals of interoperability and dynamic technical flexibility.

Respectfully submitted,

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⁸ Comments of the International Municipal Signal Association, WT Docket No. 06-150, PS Docket No. 06-229, WP Docket No. 07-100 at 7 (filed Apr. 11, 2011).