



STEVEN C. McCRAW
DIRECTOR
LAMAR BECKWORTH
CHERYL MacBRIDE
DEPUTY DIRECTORS

TEXAS DEPARTMENT OF PUBLIC SAFETY

5805 N Lamar Blvd Austin, Texas 78752
(512) 424-2000
www.txdps.state.tx.us



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June 24, 2011

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

In Re: PS Docket No. 06-229
Ex Parte Notification

Dear Ms. Dortch:

On Thursday, June 23, 2011, I forwarded by email to Jennifer Manner a courtesy copy of the attached Ex Parte notice filed by Harris Corporation with the FCC on June 23, 2011. I included the following language in my email transmission to Ms. Manner:

Consider this a courtesy copy of Harris Corporation's filing this morning. Mr. Martinez, in fact, may have a valid point. My staff and I are reevaluating the language and think we can craft it to meet his concerns. We are talking with him about it. I advised him that the interop showing to which he's referring was a draft version, and that we have not reached agreement yet on a final version.

My email transmission to Ms. Manner included an email to me from Mr. Dennis Martinez, Chief Technology Officer, Harris RF Communications Division, in which Mr. Martinez said:

Mike – I hope this note finds you well. I personally wanted to make you aware that Harris has filed comments with the FCC relative to the State of Texas Interoperability Showing. Our filing notes concerns we have with the IOT section of the document. Specifically, we are concerned that the document suggests that the current vendor (Motorola) equipment is a kind of “Gold Standard” against which other vendor equipment, both network components and user devices will be tested against. It appears to suggest that if there are limitations in functionality, the issue lies with the other vendor equipment. I do not believe this is what you intended, but that is how it is being perceived. I would like the opportunity to discuss this further with you at your convenience. Please let me know if this works for you.

Respectfully Submitted,

/s/ Michael Simpson

Michael Simpson

Assistant Director for Law Enforcement Support

Texas Department of Public Safety

5805 N. Lamar Blvd.

Austin, Texas 78752

(512) 424-7427

cc: (via email)
Jennifer Manner
Gene Fullano
Erika Olsen



HARRIS CORPORATION

Government Relations
600 Maryland Avenue, S.W.
Suite 850E
Washington, D.C. 20024
phone 1-202-729-3700
fax 1-202-729- 3735

www.harris.com

June 23, 2011

Via Electronic Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, D.C. 20554

Re: Ex Parte Notice, Docket No. PS 06-229

Dear Ms. Dortch:

Harris Corporation (“Harris”) hereby submits its assessment of the efficacy of the interoperability testing process (IOT) proposed in the State of Texas’ document: “Interoperability Showing, Technical and Operational Response, State of Texas.”¹

Harris technologists have reviewed Section E. of Texas Interoperability Showing Ex Partes 1 and 2, which are identical. Harris has strong concerns that the IOT section of this proposal will drive the use of proprietary technologies of Motorola Solutions and render less interoperability with competing networks and devices.

The Texas Interoperability Showing Ex Parte 2 states, in pertinent part:

There are two aspects of interoperability testing: 1) The Network, and 2) Devices. The network component validates that the **other suppliers’ network elements are sufficiently functional** with our selected supplier’s network components to initiate trial testing. The devices component validates that the **devices used in the trial are sufficiently functional with our network components to initiate trial testing.**²

The statement that interoperability will be met if Motorola competitors can “sufficiently” interoperate with its devices and networks does not establish a standard for full interoperability among networks and devices. Further, the term “sufficient” is not defined, nor is the level of functionality that establishes “sufficient” interoperability.

¹ See Ex Parte Notification of Michael A. Lewis, Engineering Consultant, Wiley Rein, LLP, Counsel to Motorola Solutions, Inc., PS Docket No. 06-229 (filed Jun. 21, 2011) (“Texas Interoperability Showing Ex Parte 2”); see also Ex Parte Notification of Michael Simpson on behalf of the State of Texas (filed Jun. 17, 2011) (“Texas Interoperability Showing Ex Parte 1”). Harris notes that, save the redactions of Texas Interoperability showing Ex Parte 2, Sections A. 8. and E. are identical with Texas Interoperability showing Ex Parte 1.

² Texas Interoperability showing Ex Parte 2 at 18.

Harris reiterates its position that interoperability must be viewed as “interchangeability,” so that all devices and networks can be used together fully and effectively regardless of brand or network location. With Texas Interoperability Showing Ex Parte 2’s loose and seemingly low standard of Motorola’s interoperability responsibilities, it is likely that competitor networks and devices will provide inferior interoperability on the State of Texas system, vs. two Motorola networks or devices. Accordingly, public safety jurisdictions will have two choices:

- 1) Purchase Motorola’s competitors’ products with likely inferior interoperability due to Motorola’s low interoperability standards; or
- 2) Purchase Motorola products.

These options will fail to achieve the Commission’s stated goal of full and open interoperability. These options will not generate interoperability and interchangeability but will act to create a monopoly in the public safety broadband market and thereby reduce innovation, eliminate competition, enable proprietary solutions, and severely hamper interoperability.

As an alternative interoperability requirement, Harris urges the Commission to adopt the LTE IOT standards used by commercial vendors. As has been demonstrated, these standards ensure interoperability, a diverse, competitive, and multi-source product market, and innovation. To achieve these same attributes, all Waiver applicants should be required to meet the accepted commercial LTE IOT standards.

We thank the Commission for its consideration, and look forward to further working in partnership to speed deployment of an interchangeable and interoperable public safety broadband network.

Respectfully submitted,

/s/

Patrick Sullivan
Government Relations
Harris Corporation