

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

COMMENTS OF
DALLAS/FORT WORTH INTERNATIONAL AIRPORT

The Dallas/Fort Worth International Airport (“DFW”), through counsel and pursuant to Section 1.415 of the Commission’s Rules, 47 C.F.R. §1.415, hereby respectfully submits its comments in response to the Public Notice issued by the FCC on June 15, 2011 in the above-captioned proceeding.¹

I. BACKGROUND

A. Dallas/Fort Worth International Airport

Located halfway between the cities of Dallas and Fort Worth, Texas, the Dallas/Fort Worth International Airport is the world’s third busiest, offering nearly 1,750 flights per day and serving 60 million passengers a year. DFW provides non-stop service to 144 domestic and 44 international destinations worldwide. Sitting on a campus of 18,000 acres, the airport is larger than the island of Manhattan. The Airport operates 5 passenger terminals, two full service hotels

¹ DA 11-1059, released June 15, 2011).

and is an international port of entry to the United States. For the past four years in a row, DFW has ranked in the top five for customer service among large airports worldwide in surveys conducted by Airports Council International.

DFW International Airport is an incorporated city and a sovereign jurisdiction within the State of Texas. The Airport has a commissioned police department that includes 179 sworn officers, a fire department consisting of 195 commissioned firemen, and a private security detail of 115 security officers.

DFW maintains a Critical Communications Infrastructure to provide RF communications to all divisions of the Airport. The Airport's system was installed initially with 5-channels to support analog transmissions. The system was upgraded to 10-channels in 1995. The Radio System was upgraded to full digital communications in November of 2001 and its communications were digitally encrypted for greater security in September of 2002.

Today, the Airport's RF communications environment consists of numerous Radio System platforms, in-building distributed antenna systems, distributed bi-directional amplifier deployments, conventional and trunked technologies. The current environment contains 800 MHz trunking, 700 MHz trunked, 450 MHz UHF conventional, 150 MHz VHF conventional, fully digital and analog transmissions capabilities and complete digital security encryption both at the radio level and the system level. The Critical Communications Infrastructure is supported by a fully fault tolerant redundant network switching center with two fully installed sites located in disparate locations. The center supports circuit switching CDMA technology from the Airport's legacy communications environment, advanced Packet switching TDMA, technology from recent system deployments, and fully compliance APCO P25 communications protocols through inner subsystem interfaced to radio systems of all major manufacturers.

DFW Airport is probably the most prominent terrorist target in the Northeastern region of the State of Texas as well as the region's largest economic generator. From a security perspective, the Airport relies heavily on technology to enable it to detect and apprehend persons that pose potential threats to the Airport. A very important need is the ability to transfer video from the Airport's security surveillance environment to security officials within the passenger terminals and to police vehicles on the DFW Campus. The ability for DFW to transmit high speed data for similar reasons is also critical to the successful operations of the Airport. Decisions made regarding the use of 700 MHz broadband public safety spectrum are very important to the Airport as they affect its ability to provide a safe and secure environment for its employees, its tenants and to the traveling public.

DFW Airport has previously submitted Comments in this proceeding, in conjunction with the City of Chesapeake, Virginia, the Joint Council on Transit Communications and AASHTO.

B. The Commission's Public Notice

In this portion of the proceeding, the Commission is requesting comments on a Petition for Declaratory Ruling filed by Harris Corporation ("Harris") wherein Harris requested that the Commission clarify its Conditional Waiver ("Waiver") granted to the State of Texas for early deployment of a 700 MHz public safety broadband network.

It is Harris' position that the language used in its Waiver grant to Texas may lead to mandate a single or sole source procurement model on a state, regional or national entity. The language used in the Waiver grant by the Public Safety and Homeland Security Bureau discussed the Bureau's expectation that such jurisdictions "... work with [Texas] to minimize duplicative expenses and facilities where appropriate, in order to limit the need for multiple system identifiers or other impediments to interoperability."

As one of the jurisdictions intending to deploy a 700 MHz broadband network pursuant to the Waiver, DFW Airport is one of the entities that are impacted by the Waiver language.

II. COMMENTS

As discussed in DFW's earlier comments in this proceeding, it is the position of DFW that the Commission should regulate and mandate only those rules and policies which are absolutely necessary to ensuring that the nationwide 700 MHz network is truly interoperable, and serves the needs and services for which the spectrum was intended. However, should the Commission venture further in defining the network in too much detail, the Commission runs the risk of stifling innovation, imposing unnecessary costs on users, and delaying implementation.

DFW is aware of the proposal by the PSST and others to create a single, nationwide network, and not a "network of networks". DFW is comfortable with this concept. However, until a firm set of requirements, guidelines and standards can be developed through both cooperative effort and experience, a nationwide network must also accommodate local interests, particularly those of the early builders, as well as other users. There are issues to be considered both from a policy standpoint (having public safety users involved in relevant decision making) as well as an operational structure at both a national and local level. Thus, this concept is truly one of "the devil is in the details."

The issue at hand presents the first test of the Commission's policies, and highlights the problems with early deployment. Specifically, the early adopters are implementing systems subject to rules eventually adopted by the Commission. The eventual rules could require early adopters to replace already deployed equipment, to the extent that such equipment is not consistent with the final rules.

For this reason, it is absolutely vital that systems that are deployed before final rules are created be done so in a manner that minimizes the need for re-deployment. Similarly, since it has been agreed by most industry members that the nationwide network should not be a “network of networks,” it is also important that any equipment pre-deployed not have the impact of trapping jurisdictions into a limited number of potential equipment suppliers.

DFW Airport agrees that it is important that local jurisdictions work with state officials on deployment (particularly early deployment). However, it is equally important that the Commission’s intentions be clear that there must be true interoperability during early deployment (as well as later deployments). In this case, the Bureau’s statement that jurisdictions work with the State to avoid multiple system identifiers² or other impediments to interoperability give rise to concern, because of statements made in the State’s Interoperability Showing that the “... other suppliers’ network elements are sufficiently functional with our network components to initiate trial testing.”³

The use of the word “sufficiently,” without explanation or context, gives rise to the concern that other jurisdictions may be forced to deploy equipment which must be replaced once final rules are in place, or which may only be obtained from a single manufacturer in order to have something more than “sufficient” functionality. This was indeed one of the problems with P25 deployment, in that P25 systems are required to have compatibility across only a core set of components, leading manufacturers to create add-on features, which have the ultimate impact of

² As noted in DFW Airport’s earlier Comments in this proceeding, the existence of multiple PLMIDs is not necessarily a problem, if properly managed. In fact, it can have certain advantages. However, it is DFW Airport’s recommendation that such decisions be left to the eventual nationwide licensee.

³ Texas Interoperability Showing Ex Parte Presentation, PS Docket No. 06-229, filed June 21, 2011 at 18 (emphasis added).

restricting choice, if those add-on features are desired throughout the system. Without knowing what “sufficient” means, and without knowing what level of interoperability and operability the Commission expects, there is wide-spread uncertainty. Uncertainty stifles the deployment for which the Waiver was granted.

On this basis, it is appropriate for the Commission to clarify its intention that any implementation by any of the early state-wide adopters be done in a manner to ensure that there is no impediment to equipment acquisition from a variety of manufacturers.⁴ Further, the Commission’s affirmation of true interoperability and operability must be on an infrastructure basis, as well as a subscriber unit basis. Previously, in P25 deployments, systems have been deployed to have interoperability (to a certain extent) on the subscriber side, but not on the infrastructure side. It is DFW Airport’s position that this nationwide network, to truly achieve its goal, must also have standards on the infrastructure side. This is not to suggest that each bolt and screw from every infrastructure manufacturer must match that of every other, but at the same time all of the infrastructure equipment residing within a single CORE must not be required to be acquired from a single manufacturer. DFW Airport believes that a “happy medium” between these two extremes can be found, but clear direction from the Commission is necessary to ensure that realistic middle ground is achieved.

It is DFW Airport’s intention to deploy a 700 MHz broadband system as soon as possible. DFW Airport wants to ensure that the RFPs that it releases for equipment receive responses from the widest variety of vendors possible. It is DFW Airport’s position that, should

⁴ To the extent that a smaller geographic area adopts equipment specifications that limits equipment options on that limited geographic basis, those early adopters take the risk of re-deployment once final rules are adopted. However, to the extent that such limitations are imposed on a state-wide basis, the consequences are far greater, and on a much greater scale.

the Commission provide clarification that the Commission expects there to be more than “sufficient” functionality, and that the Commission expects such standards to apply on both the subscriber and infrastructure side, there will be sufficient comfort by jurisdictions to begin deployment.

III. CONCLUSION

WHEREFORE, the premises considered, it is respectfully requested that the Commission act in accordance with the views expressed herein.

Respectfully submitted,

DALLAS-FORT WORTH
INTERNATIONAL AIRPORT

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