



# City of Seattle

Michael Patrick McGinn, Mayor

## Department of Information Technology

Bill Schrier, Director and Chief Technology Officer

3 October 2011

VIA ECFS

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554

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

Dear Ms. Dortch:

On Thursday September 29<sup>th</sup> at 12:30 PM Pacific time the Public Safety and Homeland Security Bureau of the FCC hosted a telephone call with some of the jurisdictions who have received waivers to build LTE public safety wireless broadband networks in the 700 MHz spectrum pursuant to FCC Public Safety Docket No. 06-229. On the call from the Bureau were Bureau Chief James A. Barnett, Jr., Deputy Bureau Chief Jennifer Manner, Gene Fullano and Behzad Ghafjari (this list of FCC participants may not be complete).

Participating in the call, with jurisdiction noted, were:

- Adams County Colorado - Walt Leslie, Brian Sheppard
- Bay Area RICS - Mark Ellison, Jennifer Cetta
- Boston - Don Denning
- Charlotte - Nelson Baker
- Chesapeake - Bernie Reaser, Alan Tilles
- Hawaii - Robert Hlivak, Todd Crosby
- Los Angeles - Sara Henry
- Mesa - John Minick
- Mississippi - Bill Buffington
- New Jersey - Bruce Leck
- New Mexico - Mike Neitzey, Woody Dyche, Matthew Plache, Al Catalano, Jacque Miller
- New York State - Matthew Delaney
- Oregon - Steve Noel
- Pembroke Pines - Tony Soviero, Ken Boley
- Seattle - Bill Schrier
- Texas - Mike Simpson, Cynthia Cole, Mike Barney

*continued*

Bill Schrier of the City of Seattle opened a discussion of Public Land Mobile Number Identifiers (PLMN-IDs). He stated it is Seattle's understanding is that under the December 2010 waiver order each waiver recipient needs to ask for assistance (or maybe permission) from the FCC to obtain a PLMN-ID, at least 90 days before service availability of an LTE network. Service availability is radio frequency broadcast involving 50 or more LTE subscriber units.

Seattle feels this is a piecemeal approach, where each early builder or waiver recipient is treated individually as they become ready to deploy. Everyone involved in this proceeding wants to build a network is interoperable nationwide. And we want to do it in a cost effective manner. Programming and reprogramming identification numbers into eNodeB's and subscriber units is labor-intensive. Seattle would prefer the FCC issue an order or take other action which gives a more immediate and definitive answer to the question of network identifiers and PLMN-IDs before most of us deploy. Ideally, we'd use a single PLMN-ID nationwide for public safety.

Seattle also noted PLMN-ID is just one of a number of numeric identifiers involved in the network. Seattle further suggests the FCC would endorse the PSCR study item on network identifiers so we have a comprehensive solution by January, 2012. And Seattle suggests endorsement of the PSCR study item because the FCC has already, in its first May 2010 waiver order, endorsed PSCR as the test bed for equipment interoperability.

Seattle then asked if others on this call could endorse this call for quicker and more comprehensive action by the Commission, and second, Seattle asked the Bureau if it can, in the interest of promoting nationwide interoperability, see a method to take earlier and more comprehensive action on the numeric identifiers issue.

Representatives of the following jurisdictions then spoke on the telephone supporting Seattle's call for quicker and more comprehensive Commission action, and also supported a single PLMN-ID for nationwide use by public safety: Adams County; Cities of Boston, Mesa, Charlotte, Pembroke Pines, States of Hawaii, New Jersey, New York, Oregon, Texas.

The Bay Area RICS supports a single PLMN-ID.

City of Chesapeake supported quicker and more comprehensive action. Alan Tilles further stated Chesapeake is on the record supporting allowing users to have multiple PLMN-IDs if they wanted and have industry work out the numeric identifiers issue. Since Chesapeake filed on the record, industry has determined a single ID is a better solution. So now Chesapeake supports Commission action for a single ID.

Chief Jamie Barnett and Jennifer Manner then asked Schrier a set of questions, the substance of which follows. PLMN-ID is one of many identification codes. How about all the rest? Who will manage the identifiers and the roaming agreements with 3rd parties? In managing this, there is also expense. Who will bear that expense? While PSCR is working on a study item on identifiers, the FCC has no visibility into the PSCR process. Delivery of the numeric identifiers study item is in January. Any endorsement of that work and its results would have to go out for public comment. The bureau would like to see a more complete package addressing these questions.

*continued*

Subject: Notice of Ex Parte Conversation, PS Docket No. 06-229  
3 October 2011, Page 3

Schrier stated he did not have answers to most of those questions at this time, but felt it was important to endorse or acknowledge the PSCR process, since it involved many public safety entities, manufacturers, carriers and others, as a pathway toward a standardized solution for the network identifiers issue.

Respectfully submitted,

A handwritten signature in cursive script that reads "Bill Schrier".

William (Bill) Schrier  
Chief Technology Officer  
City of Seattle  
e-mail: [bill.schrier@seattle.gov](mailto:bill.schrier@seattle.gov)  
phone: 206-684-0633