Davis Wright Tremaine LLP

Suite 800
1919 Pennsylvania Avenue NW
Washington, DC 20006-3401

Randall B. Lowe
202.973.4221 tel
202.973.4499 fax

randylowe@dwt.com

November 10, 2011

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

Re: Fourth Further Notice of Proposed Rulemaking (WT Dkt. No. 06-150; PS Dkt. No. 06-229; WP Dkt. No. 07-100)

Dear Ms. Dortch:

On November 10, 2011, Robert Peirce, Chief Alliance Officer of National LambdaRail, Inc. ("NLR"), Kurt Snodgrass, Chief Operating Officer of NLR, and the undersigned, counsel for NLR, met with Jennifer Manner, Robert Pavlak, Gene Fullano, Rasoul Safavian and Pat Amodio of the Commission to discuss the letter of NLR dated October 7, 2011 that was filed in the above-referenced matters. In addition, NLR distributed and the parties discussed the attached document entitled "National LambdaRail: The Backbone Component of a Nationwide, Broadband, Interoperable Public Safety Network."

Respectfully submitted,

Randall B. Lowe
Attorney for National LambdaRail, Inc.

cc: Jennifer Manner
Robert Pavlak
Gene Fullano
Rasoul Safavian
Pat Amodio

NATIONAL LAMBDARAIL: THE BACKBONE COMPONENT OF A NATIONWIDE, BROADBAND, INTEROPERABLE PUBLIC SAFETY NETWORK

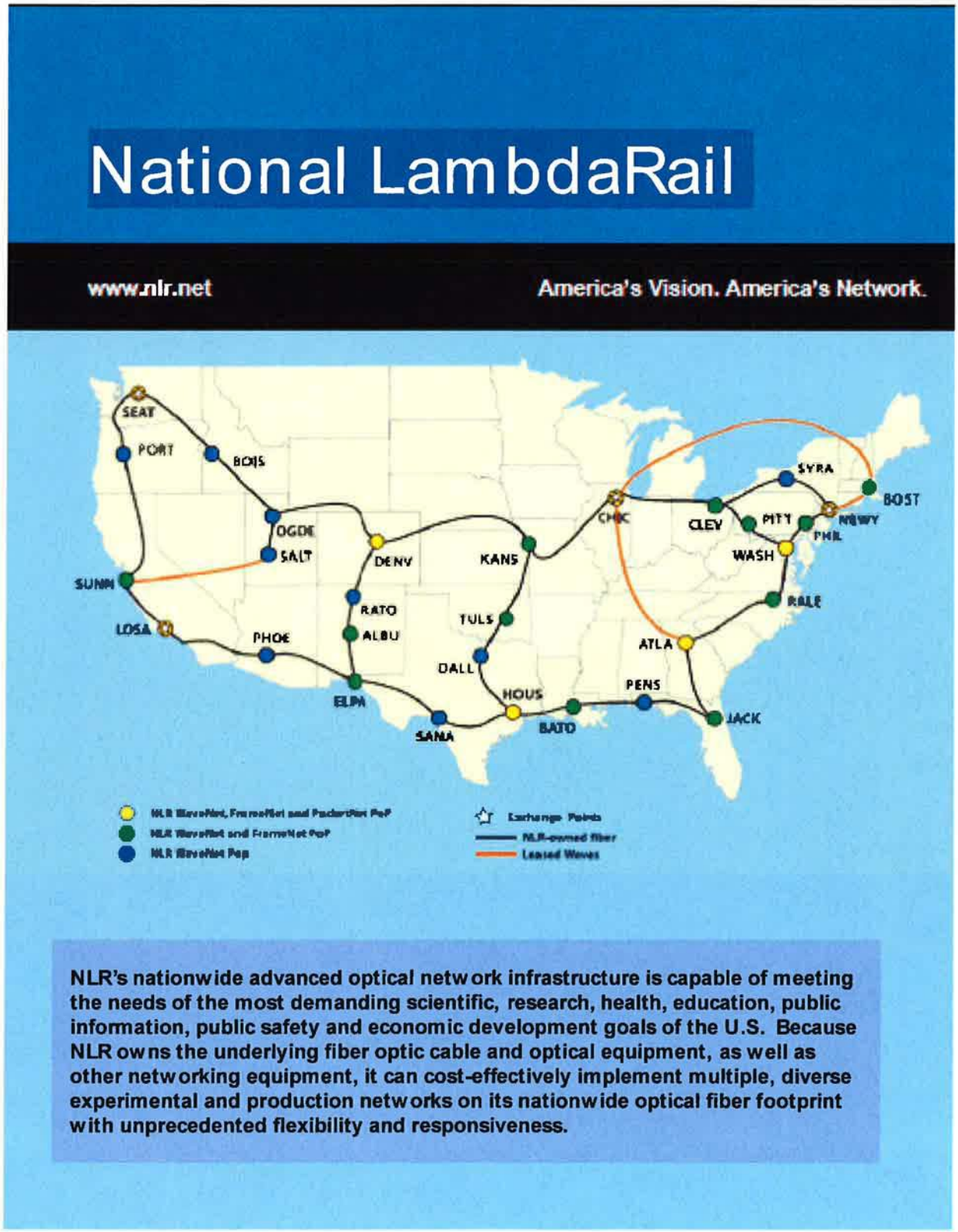
On October 7, 2011, National LambdaRail ("NLR"), a non-profit organization, filed *ex parte* comments before the Commission on its Fourth Further Notice of Proposed Rulemaking regarding the establishment of a nationwide, broadband, interoperable public safety network. NLR offered itself as the backbone component of such a network and, in doing so, commented that: (i) connectivity through a common backbone is preferable to a patchwork of direct, one-to-one connections; (ii) one backbone network is preferable to multiple backbones; (iii) it may be more practical to connect to a backbone via local or regional networks; (iv) a clearinghouse is only necessary in the event of multiple backbones; (v) the public Internet should only be used, if at all, as a redundant network because it can be fragile and insecure; and (vi) it is not necessary to require a dedicated, stand alone backbone but, instead, it is adequate to use dedicated circuits or discreet channels on an existing backbone. NLR closed its comments by noting that not only does NLR own, operate and maintain its network (see Figure 1), but that it is connected to 14 regional networks ("RONs"), which permit access to NLR's network throughout the country (see Table 1), that NLR's network is easily accessible by other RONs (see Table 1) and that the public safety agencies can connect to NLR either via the RONs or directly. NLR concluded, therefore, that its "network is perfectly suited for what the Commission has in mind."

The purpose of this document is to emphasize to the Commission that the NLR network is an extremely robust, nationwide, fiber infrastructure that today primarily serves the research and education community but can readily be used to serve as the backbone of a public safety network. Although networks such as ARPANET, NSFnet and Internet2 have served a good and valuable purpose, the research and education community understood the importance of owning a network infrastructure, which resulted in the creation of NLR to provide a national backbone link to the RONs with advanced broadband capabilities and capacity. As a result, NLR and each RON have the ability to meet the middle mile and backbone needs of the public safety agency community through a uniquely robust and secure broadband network.

The foundation of the NLR infrastructure is a dense wave division multiplexed optical footprint consisting of roughly 12,000 route miles of dedicated fiber with a maximum capacity of up to 40 wavelengths. Although each wavelength can support transmissions of up to 10 Gbps, NLR is in the process of upgrading the network to eventually support transmissions of up to 100 Gbps per wavelength.

The Commission should take full advantage of the advanced network infrastructure that has been deployed by NLR across the nation. The rational for doing so is as simple as it is compelling: NLR's network is already in place and ready to be used and NLR possesses the leadership, knowledge and expertise to operate and maintain that infrastructure as the backbone of a nationwide, broadband, interoperable public safety network envisioned by the Commission.

Figure 1


National LambdaRail
www.nlr.net
America's Vision. America's Network.
SEAT
PORT
BOIS
OGDE
SALT
DENV
KANS
CHIC
CLEV
SYRA
BOST
PITT
NEWY
PHIL
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RALE
SUNN
LOSA
PHOE
RATO
ALBU
TULS
DALL
ELPA
SANA
HOUS
BATO
PENS
ATLA
JACK
Exchange Points
NLR-owned fiber
Leased Waves
NLR's nationwide advanced optical network infrastructure is capable of meeting the needs of the most demanding scientific, research, health, education, public information, public safety and economic development goals of the U.S. Because NLR owns the underlying fiber optic cable and optical equipment, as well as other networking equipment, it can cost-effectively implement multiple, diverse experimental and production networks on its nationwide optical fiber footprint with unprecedented flexibility and responsiveness.

Table 1

Regional Optical Networks

RONs Connected to NLR	States Served by the Connected RONs
CENIC	California, Nevada, Arizona
FLR	Florida
FRGP	Colorado, Utah, Wyoming, Idaho
LEARN	Texas
MATP/MAX	Virginia, Maryland and DC
NCREN	North Carolina
NeLR	New York, Massachusetts
NMLR	New Mexico
ONECOMMUNITY	Northeast Ohio
ONENET/ARKANSAS NET	Oklahoma, Arkansas
ORNL/FUTURENET	Atlanta to Chicago
PNWGP	Washington, Oregon, Hawaii, Alaska, Montana, Idaho
PSC/3ROX	Western Pennsylvania, West Virginia
SLR	Georgia, Alabama, Tennessee, Kentucky

Other Available Connections	States Served by the Other Available Connections
BOREAS	Wisconsin, Minnesota, Iowa
CONNECTICUT NET	Connecticut
GPN	Nebraska, Kansas, Iowa, Missouri
ILIGHT	Indiana
IRON	Idaho, Eastern Washington
LONI	Louisiana, Mississippi
MAGPI	Eastern Pennsylvania, Delaware, New Jersey
MERIT	Michigan
MORENET	Missouri
MREN	Illinois
NEVADA NET	Nevada
NORTHERN TIER	North Dakota, South Dakota, Montana, Idaho
NOX	Massachusetts, Vermont, New Hampshire, Maine
NYSERNet	New York
OARNET	Ohio
OMNIPOP	Big 10 Universities
OSHEAN	Rhode Island
WISCNET	Wisconsin