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November 14, 2011

VIA ECFS

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

**Re: Ex Parte Presentation
PS Docket No. 06-229**

Dear Ms. Dortch:

On Wednesday, November 9, 2011, Mike Simpson and Cynthia Wenzel Cole, representing the State of Texas – Department of Public Safety Interoperable Communications Program Office (“Texas DPS”), met in person at the FCC headquarters at the address above, with Jennifer Manner, Gene Fullano, Pat Amodio, Kim Anderson, Jason Kim, Rasoul Safavian, Bob Pavlak, Brian Hurley, and Erika Olsen by phone bridge, all of the Public Safety and Homeland Security Bureau (the “Bureau”). Bob Pavlak was absent for the PLMN ID-related portion of the discussion.

The purpose of the session was to discuss the two recent filings by Texas DPS, the *Response to the PLMN ID Letter* (“PLMN ID Response”) filed with the Commission on November 8, 2011, and the *Texas Interoperability Showing, v8.0* (“Showing”) filed with the Commission on November 4, 2011.

During the conversation the following additional and more specific topics were discussed:

- Regarding the Showing, the Bureau communicated that the initial review identified some issues that will need to be addressed in a requested update to the Showing:
 - For procedural reasons, the body of the document needs to be the same as the previous September 20, 2011 version requiring that the paragraphs added to sections A.4 and B.1 in v8.0 be removed.
 - The new “Expansion Module” section and associated application process proposal was discussed, and it was emphasized that this “Expansion Module” approach is still in review by the Bureau. The Bureau did have some initial comments regarding the “Coverage Polygon” and modular coverage expansion application approach:

- The Bureau is considering granting Texas the authority to operate in the “incidental coverage” areas. “Incidental coverage” is defined to mean areas where useable PS LTE signals are present outside the boundaries of the coverage polygons. Mr. Simpson noted that public safety network users would need to be informed that data uplink and downlink speeds for these areas are not guaranteed to be the same as within the polygon boundaries.
 - The Bureau posed some specific questions on the deployment schedule and coverage modeling assumptions; these were not resolved in the meeting, require follow-up, and should be clarified in the next Texas update to the Showing.
- The Bureau emphasized the importance of concluding the next update as quickly as possible and further directed us to prioritize the minor updates to the Showing over the revisions to the PLMN ID Response.

PLMN ID Response Letter Content (Bob Pavlak not present):

The group discussed specific aspects the document process, next steps, general policies and specific elements of sections E.3, F and G and H of the PLMN ID Response. These topics included:

- The Bureau emphasized that as the waiver recipient, the State of Texas (“State”) is responsible for FCC rule and order compliance for all 700 MHz PS LTE sub-systems operating under the Texas waiver (such as the layer now under construction by Harris County).
- Additional clarifications were requested regarding the costs of the “Initial Allocation” of the Network Identifiers as described in the PLMN ID Response document. Further, the Bureau made it clear that exactly who actually performs the Initial Allocation is not a decision the Bureau will make. The Bureau indicated that the Public Safety Broadband Licensee, the Public Safety Spectrum Trust (PSST), does not have the authority to build or operate a broadband network. Additionally, the Bureau also felt the PSST does not have the authority to become the *Interim Nationwide Network identifiers Management Entity* as suggested in the Texas PLMN ID Response. Mr. Simpson advised that Texas would continue to collaborate with the broader nationwide public safety community (including the PSST), the LTE manufacturers and integrators, and the commercial carrier s to attempt to come to a voluntary consensus for the “Initial Allocation.”
- Ms. Manner noted that the Bureau would appreciate being advised of any additional cost or cost/benefit information that Texas might have, or be able to uncover and share.
- Ms. Cole emphasized that the issues presented reveal the larger problem of the critical need for a centralized, overall network design entity. She contended that to enable a nationwide network, a “Network HQ” would be needed to manage network architecture aspects, such as the numerical schemes around network identifiers, implementing multiple HSSs, DIAMETER Routing, O&M (Operations and Management), and security.¹

¹ This list should also include network backhaul design and multi-agency billing.

- The Bureau requested a particular clarification in section C.3.4 reference to “expansion to federal agencies.” Ms. Manner said the Bureau would gladly consider the addition of federal agency users to a State of Texas PS LTE network – that Texas should present the request to the Bureau in the form of a waiver petition.
- The State notified the Bureau that because of some formatting errors, it would be re-filing the current version of the PLMN ID Response, with the formatting errors corrected.
- The Texas team agreed to work on the topics discussed and understood that additional feedback and questions are likely once the Bureau has the opportunity to more thoroughly review the Texas filings.

Respectfully submitted,

/s/ Michael Simpson

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