



Federal Communications Commission
Washington, D.C. 20554

November 17, 2011

Mr. Charles Robinson
Key Business Executive, Business Support Services
City of Charlotte
600 East 4th Street
Charlotte, NC 28202

Re: PS Docket No. 06-229, Request for a PLMN ID

Dear Mr. Robinson,

In its November 15, 2011 supplement to its Sixth Quarterly Report, the City of Charlotte, North Carolina (Charlotte) provided notice to the Public Safety and Homeland Security Bureau (Bureau) of its need for a permanent PLMN ID for the public safety broadband network it is deploying pursuant to its waiver.¹ In a recent conversation with Bureau staff, Charlotte indicated its preference that all waiver recipients' networks share the use of a single PLMN ID.² To help the Bureau better understand this proposal we request that you respond to the following questions by Monday, November 28, 2011.

1. Please confirm Charlotte's preference for the use of a single PLMN ID for all waiver recipient networks, including Charlotte's. If that is not your preference, what is? Also, has Charlotte coordinated this preference with the State of North Carolina and, if so, can you please provide evidence of this coordination.³
2. What is Charlotte's plan for roaming on to a commercial network when other waiver operators, if they have the same PLMN ID as Charlotte, may also roam on to the same commercial network? How does this work technically and operationally? Is all necessary equipment and software developed that will allow the use of the same PLMN ID between Charlotte, the waiver operators and commercial roaming networks?
3. What is Charlotte's plan to ensure interworking (*i.e.*, roaming and interconnectivity among waiver jurisdiction deployments) prior to full migration to a nationwide network? How does

¹ See City of Charlotte Quarterly Report Supplement, PS Docket 06-229 (filed Nov. 15, 2011) (Quarterly Report Supplement).

² See City of Seattle Ex Parte Filing, PS Docket 06-229 at 2 (filed Oct. 3, 2011) (identifying Charlotte as a jurisdiction that "supported a single PLMN ID for nationwide use by public safety" during a conversation with Bureau staff).

³ See Requests for Waiver of Various Petitioners to Allow the Establishment of 700 MHz Interoperable Public Safety Wireless Broadband Networks, PS Docket 06-229, *Order*, 25 FCC Rcd 5145, 5162-63 ¶ 52 (2010) (*Waiver Order*) (requiring non-state waiver recipients to engage in coordination with their state governments).

this work technically and operationally? Will this be available on day one of deployment as required by Charlotte's waiver authorization?⁴

4. What is Charlotte's plan for transition of the Charlotte network to a nationwide network with a single PLMN ID? Has Charlotte coordinated such an approach with other waiver jurisdictions? How will this transition of the Charlotte network into a nationwide network with one PLMN ID affect other network identification codes, such as Tracking Area Codes (TAC), PDN identifiers, eNodeB identifiers, and Mobility Manager Entity Group Identifier (MMEGI), and how will they be managed technically and operationally? What are the cost factors that would be involved?
5. If Charlotte uses a single PLMN ID in common with other waiver jurisdictions and ultimately with a nationwide network, will there be a subsystem of identification of Charlotte and other jurisdictions? Will such a subsystem use the seventh, eighth and perhaps higher order digits of the international mobile subscriber identification in order to identify the jurisdictions? If so, will this limit the number of individual users on the network or in any way impact the ability to support non-public safety users? Since this is not the way that commercial entities use the code, are there other consequences that would impact the operation of the network? If this is not the way Charlotte and other individual jurisdictions will be identified on the network, what method will be used?
6. Based on your recent quarterly report as supplemented, we understand that Charlotte's operational date is June 30, 2012.⁵ Given your responses to the questions above, what actions must be taken to ensure that you meet your deployment schedule? To the extent that any action is dependent on parties not affiliated with Charlotte, how can you ensure that any action is done within the deployment timeframe?

We appreciate your time and attention to this matter. If you have any questions about this request, please contact Jennifer Manner, Deputy Bureau Chief, at 202-418-3619 or jennifer.manner@fcc.gov.

Sincerely,



James Arden Barnett, Jr., Rear Admiral (Ret.)
Chief, Public Safety and Homeland Security Bureau

⁴ See *id.* at 5160 ¶ 45; see also Requests for Waiver of Various Petitioners to Allow the Establishment of 700 MHz Interoperable Public Safety Wireless Broadband Networks, PS Docket 06-229, *Order*, 25 FCC Rcd 17156, 17159 ¶ 9 (PSHSB 2010) (*Interoperability Waiver Order*).

⁵ See Quarterly Report Supplement at 4.