



TELECOMMUNICATIONS
INDUSTRY ASSOCIATION

HEADQUARTERS

2500 Wilson Boulevard
Suite 300
Arlington, VA 22201-3834
+1.703.907.7700

D.C. OFFICE

10 G Street, N.E., Suite
550 Washington, DC 20002
+1.202.346.3240 MAIN
+1.202.346.3241 FAX

tiaonline.org

December 16, 2011

Via Electronic Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: *Ex Parte* Submission – WT Docket No. 11-69, ET Docket No. 09-234

Dear Ms. Dortch:

The Telecommunications Industry Association (TIA) hereby submits this filing to communicate support for the Enterprise Wireless Alliance (EWA) Request for Further Clarification filed in the above-captioned proceeding filed on October 26, 2011.¹ It is critical for the Commission to ensure that there is clarity among manufacturers and users of Terrestrial Trunked Radio Technology (TETRA), particularly in the public safety space. TIA concurs with EWA that the need for further clarification does exist in this docket.² As described below, TIA agrees with EWA that the FCC should make clear that (i) all relevant Part 90 frequency coordination requirements, including the narrowbanding exemption, apply to TETRA; and (2) TETRA uses will only be allowed in excepted Part 90 systems. Furthermore, TIA urges the Commission to facilitate an inclusive dialogue amongst TETRA stakeholders to resolve any questions and differences that would include the Commission.

TIA represents the global information and communications technology (ICT) industry through standards development, advocacy, tradeshow, business opportunities, market intelligence and world-wide environmental regulatory analysis. For over eighty years, TIA has enhanced the business environments for broadband, mobile wireless,

¹ Request for Further Clarification filed by Enterprise Wireless Alliance, WT Docket No. 11-69 (filed Oct. 26, 2011) (EWA Petition for Clarification).

² EWA Petition for Clarification at 3.

information technology, networks, cable, satellite, and unified communications. TIA's 500 member companies' products and services empower communications in every industry and market, including healthcare, education, security, public safety, transportation, government, the military, the environment, and entertainment. TIA is accredited by the American National Standards Institute (ANSI). A number of TIA members produce Part 90 compliant devices (including public safety narrow band devices), Part 90 compliant systems, other narrowband systems (i.e. TETRA), and are involved in Project 25, the initiative that continues to develop standards for narrowband operability.³

I. TIA Agrees the FCC Should Clarify that All Relevant Part 90 Frequency Coordination Requirements Apply to TETRA.

In its Clarification Order, the FCC indicated that it intended to avoid implementing a larger exception for TETRA changes than for other technologies effecting narrowband technology.⁴ The Commission stated that

...frequency coordination is not required for TETRA modification applications only if the only proposed change to the station's technical parameters is the emission bandwidth. For example, a change from emission designator 20k0D1W to a TETRA emission designator of 21k0D1W would not require coordination,⁵

³ TIA's TR-8 has created a series of technical documents known as the TIA-102 suite of standard. This consensus-based standard describes and/or defines a number of the interfaces associated with The Project 25 Standard digital land mobile radio system. Law enforcement and other public safety entities may or may not utilize wireless communications systems and equipment which include the TIA-102 standard, in whole or in part. Additionally, in cases where public safety utilizes TIA-102-based equipment, such equipment may also include features and functions that are not defined by the standard, but which features and functions a public safety agency requires for addressing that agency's operational needs. *See* <http://www.tiaonline.org/standards/committees/committee.cfm?comm=tr-8>.

An overview of the most recent TR-8 activity is provided in TIA's annually released report on its standards activity. *See* TIA, 2010-2011 Standards & Technology Annual Report (rel. Apr. 2011) at 8-11, available at http://tiaonline.org/standards/about/documents/StarReport_10-11.pdf.

⁴ Order on Clarification, WT Docket No. 11-69 and ET Docket No. 09-234, 26 FCC Rcd 13360 (rel. Sept. 28, 2011) at ¶ 20 (Clarification Order).

⁵ Clarification Order at ¶ 10.

As written, TIA agrees that this will result in an increase in the authorized bandwidth which is inconsistent with the narrowbanding exception limited to proposals to reduce authorized bandwidths.⁶ This exception for TETRA should only apply where a TETRA trunking station was previously coordinated and licensed with the ‘reduced deviation’ TETRA emission designator of 20K0D1W, and where TETRA transmitter has been re-certified to an emission designator of 21K0D1W. This would be where a licensee is seeking modification to upgrade a licensed TETRA trunking transmitter from ‘reduced deviation’ TETRA operation under 20K0D1W emissions to standard TETRA operation under 21K0D1W emissions. Where TETRA trunking coordination is governed by 90.187, *e.g.*, 450-470 MHz band, the change from 20K0D1W to 21K0D1W emissions must not significantly increase adjacent channel interference. TIA wonders if the Commissions intended to state:

...frequency coordination is not required for TETRA modification applications only if the only proposed change to the licensed station’s technical parameters is the TETRA emission bandwidth. That is, a change from a ‘reduced deviation’ TETRA emission designator of 20k0D1W to a TETRA emission designator of 21k0D1W would not require re-coordination,...

The Commission is strongly encouraged to provide clarity for manufacturers and equipment users by stating that applications involving TETRA are subject to all applicable Part 90 frequency coordination requirements, including the narrowbanding exemption; by stating that increasing power levels of the transmitters such as to require operation under the waiver will always be subject to frequency coordination; and by ensuring that TETRA is be treated equally with other applications.

⁶ EWA Petition for Clarification at 1-3.

II. TIA Agrees that the Commission should Clarify that TETRA Uses Can Be Allowed Only in Excepted Part 90 Systems.

The record in this docket establishes that TETRA use is “not suitable for operating in shared channels.”⁷ This is a very important characteristic of TETRA uses, and because TIA agrees with EWA that a full understanding does not exist in the current space, it is critical to provide needed clarity on the implications of this principle. Therefore, TIA also agrees that the Commission should clarify that a licensee presently using a 25 kHz bandwidth channel system below 512 MHz in a shared spectrum environment must both adjust the emission designator to show TETRA use and attain frequency advisory committee certification to operate exclusive use channels, and that only systems permitted exclusive use of their 800/900 MHz channels or by FCC waiver can qualify for TETRA deployment.⁸

III. The Commission Should Facilitate Increased Dialogue Amongst TETRA Stakeholders in this Matter to Ensure Consistency in Understanding and Expectations Regarding Allowed Uses.

The differences in the understanding of the rule changes proposed or implemented regarding TETRA use among stakeholders should be a source of concern to the Commission. The facilitation of an inclusive discussion between relevant stakeholders and the Commission would, in TIA’s opinion, be highly constructive and would help ensure that there is clarity among manufacturers and users, particularly in public safety uses. Such consultation would reduce the inconsistencies in understanding of the scope and meaning of Commission rules regarding the use of TETRA, and would preserve the use of stakeholder resources in efforts related to TETRA deployments.

⁷ See Reply Comments of the TETRA Association, WT Docket No. 11-69 and ET Docket No. 09-234, at 12 (filed Aug. 9, 2011).

⁸ EWA Petition for Clarification at 3.

For the above reasons, TIA urges the Commission to provide the clarifications requested in the EWA request, as well as to facilitate an open dialogue amongst TETRA stakeholders, including the Commission, to resolve any questions and differences.

Respectfully submitted,

**TELECOMMUNICATIONS INDUSTRY
ASSOCIATION**

By: /s/ Mark Uncapher

Mark Uncapher
Director, Regulatory and Government
Affairs

Brian Scarpelli
Manager, Government Affairs

**TELECOMMUNICATIONS INDUSTRY
ASSOCIATION**

10 G Street N.E.
Suite 550
Washington, D.C. 20002
(202) 346-3240