

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of )  
 )  
Requests for Waiver by Various )  
Petitioners to Allow the Establishment ) **PS Docket No. 06-229**  
Of 700 MHz Interoperable Public Safety )  
Wireless Broadband Networks )  
 )

Date Filed: March 30, 2012

1. This filing is a response from the 700 MHz public safety broadband waiver recipients (Petitioners)<sup>1</sup> to requirements contained in paragraph 21 of Order DA 12-25, which the Public Safety and Homeland Security Bureau (“Bureau”) adopted on January 9, 2012 (“PLMN-ID Order”). This Order requires Petitioners to develop and “implement, with the assistance of a common competent administrator, a scheme for the assignment of International Mobile Subscriber Identities (IMSI) and other identification numbers necessary to support all the Petitioners’ operations of LTE broadband deployments on an interoperable basis”<sup>2</sup>.
2. Previously, through the assistance of the Department of Homeland Security’s Office of Emergency Communications (DHS/OEC), Petitioners selected Science Applications International Corporation (SAIC) to serve as the common numbering administrator for the purposes described in the PLMN-ID Order<sup>3</sup>. The Bureau approved this selection<sup>4</sup>.

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<sup>1</sup> In May 2010, the Commission granted conditional waivers to twenty-one public safety jurisdictions to pursue early deployment of the public safety broadband network in the public safety broadband spectrum. 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, 5147 ¶ 7 (2010) (*Waiver Order*). The Bureau granted a twenty-second waiver, in May 2011, to the State of Texas (Texas) and required Texas to adhere to the cumulative conditions imposed on the initial waiver recipients. 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, 26 FCC Rcd 6783 (PSHSB 2011) (*Texas Waiver Order*). For purposes of this filing, the term “Petitioners” includes the State of Texas.

<sup>2</sup> *PLMN-ID Order*, ¶ 2.

<sup>3</sup> Joint Filing of the Petitioners on February 8, 2012.

Petitioners assigned SAIC each of the responsibilities stated in paragraph 19 of the PLMN-ID Order. DHS/OEC is bearing the costs of SAIC's services.

3. Paragraph 21 of the PLMN-ID Order requires Petitioners to complete development of the scheme by March 31, 2012. With this filing, the Petitioners notify the Bureau that the scheme has been completed as required, with the assistance of SAIC. In addition, the Petitioners understand the PLMN-ID Order's requirement, reiterated in the Numbering Administrator Approval Order<sup>5</sup>, that each Petitioner must verify compliance with the deadline in the "Deployment" section of our April, 2012, quarterly reports, including verifying the retention of a common numbering administrator.

4. The Petitioners will provide a copy of the numbering scheme to the Bureau at its request.

5. The Petitioners discussed the contents of this filing during a conference call on March 28, 2012. I, William M. Schrier, Chief Technology Officer for the City of Seattle and Chair of the Public Safety Spectrum Trust Operator Advisory Committee (PSST-OAC), the formal organization of the Petitioners, hereby declare the scheme was verbally approved without objection by representatives of all eighteen of the Petitioners who participated on that call.

Respectfully submitted,



William M. Schrier  
Chief Technology Officer  
City of Seattle, Washington

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<sup>4</sup> FCC Public Safety and Homeland Security Bureau Order DA 12-423 dated 16 March 2012 ("Numbering Administrator Approval Order").

<sup>5</sup> *Numbering Administrator Approval Order*, ¶ 13.