

In the Matter of)	
<i>Recommended Minimum Technical Requirements</i>)	PS Docket 12 - 74
<i>to Ensure Nationwide Interoperability for the</i>)	
<i>Nationwide Public Safety Broadband Network</i>)	
)	
Comments on the Final Report of the Technical)	
Advisory Board for First Responder Interoperability)	

The Arkansas Interoperable Communications Executive Committee (AICEC) hereby files and asks that the FCC (Commission) accept this document as comments to FCC PS Docket 12 - 74 *Recommended Minimum Technical Requirements to Ensure Nationwide Interoperability for the Nationwide Public Safety Broadband Network*, released May 22, 2012. These comments are the result of the work of the Arkansas Interoperable Communications Committee (AICC) Public Safety Broadband Advisory Group. The remarks below result from a review of the document by committee members and discussion of the specifics included in the report. The reviewers remarks are categorized as follows: General Comments, 3GPP LTE Standards, Interfaces and Guidelines, User Equipment and Device Management, Testing, Evolution, Handover and Mobility, Grade of Service, and Security

I. GENERAL COMMENTS

The Arkansas Interoperable Communication Committee (AICC) would like to thank the members of the Technical Advisory Board for First Responder Interoperability for their efforts in developing this set of Minimum Technical Requirements. A great deal of thought and effort has gone into the development of this document and AICC appreciates the service of the members of the board.

The State of Arkansas has demonstrated its support of the public safety community with the implementation of the Arkansas Wireless Information Network (AWIN). AWIN is a multi-jurisdictional, multi-disciplinary digital radio system that serves 22,000 first responders. The AWIN system has been fully operational since October of 2006. Since then the state has continued to support public safety by providing operational funding in support of AWIN. Through responsible governance, and careful asset management, the state has been able to not only maintain, but grow the system.

This spring the AICC determined that Public Safety Broadband was the appropriate next step for the first responders of the state. A high level set of strategies have been developed in preparation of the coming opportunities. The AICC looks forward to working with the Commission and FirstNet in the build out of the National Public Safety Broadband Network (NPSBN).

II. 3GPP LTE STANDARDS, INTERFACES AND GUIDELINES

The AICC supports the Boards recommendations in regards to 3GPP LTE standards. However, it is noted that the term “4G” was not mentioned in the document. While it is understood that the 4G is actually

3GPP Release 10 (and beyond), some reviewers felt it would add clarity to define the connection between the two terms.

Section 4.1.5.1 explains that the use of the terms “device” and “UE” are taken to mean the same thing in 3GPP parlance. For these requirements using these terms interchangeably is distracting. One term **should** be used consistently.

III. USER EQUIPMENT AND DEVICE MANAGEMENT

The AICC supports the Boards recommendations that User Equipment must meet 3GPP standards. The AICC would strongly urge that the document include recommendations that the User Equipment be “public safety grade” or “duty grade”. Public Safety personnel have a need for equipment that is ruggedized, for example impact and water resistant. Standards and measurements for meeting public safety grade are available and should be incorporated in this document.

IV. TESTING

The Testing section does not address requirements or considerations of how testing would be conducted in State’s that choose to opt out. This may be more of a policy issue and less of a technical issue. This issue should be included in the Recommended Considerations.

V. EVOLUTION

The AICC is concerned that redundancy and resiliency are not addressed until the section on Evolution. Public Safety requires systems that are available 24 X 7 X 365. This is a critical issue and should be addressed more fully, perhaps as its own section that deals with the redundancy requirements for early phases of the build out.

VI. HANDOVER AND MOBILITY

No comments.

VII. GRADE OF SERVICE

All Recommended Considerations should be changed to Recommended Requirements. This information is critical to those who administer and manage public safety communications systems.

VIII. SECURITY

Security will be a significant issue for the NPSBN and the AICC concurs with the Boards recommendations. The AICC feels that an additional requirement clearly stating that all traffic be encrypted is appropriate.

IX. CONCLUSION

Providing adequate tools to the public safety community across the nation is of critical importance. Getting the requirements right from the beginning will ensure that the network that is developed will provide the service that our first responders need for years to come. The AICC appreciates the opportunity to provide these comments and looks forward to the development of the NPSBN.

