

## Technical Advisory Board for First Responder Interoperability

June 19, 2012

Ms. Marlene H. Dortch  
Secretary to the  
Federal Communications Commission  
Washington, D.C. 20554

Re: *Ex Parte* Communication- Technical Advisory  
Board for First Responder Interoperability Report  
On Recommended Minimum Technical Requirements  
for Interoperability- PS Docket 12-74.

Dear Ms. Dortch:

The Technical Advisory Board for First Responder Interoperability has authorized this letter addressing Recommended Requirement 15 of its May 22, 2012 Final Report.

The May 22, 2012 Final Report fulfilled the requirement of the Technical Advisory Board under Title VI, Public Safety Communications and Electromagnetic Spectrum Auctions of the Middle Class Tax Relief and Job Creation Act of 2012, Public Law 112-96. Under the law, the Commission established the Technical Advisory Board to develop recommended minimum technical requirements to ensure a nationwide level of interoperability for the Nationwide Public Safety Broadband Network (NPSBN). The work included consultation with representatives of the National Telecommunications and Information Administration and the National Institute of Standards of the Department of Commerce and the Office of Emergency Communications of the Department of Homeland Security. The Final Report was submitted to the Commission on May 22, 2012. The Commission made the report available for comment on May 23, 2012.<sup>1</sup>

The Technical Advisory Board believes there is a need to make a clarification regarding Recommendation 15. Recommendation 15, at page 10 states that "All User Devices (UEs) deployed in the NPSBN (National Public Safety Broadband Network) that support roaming onto commercial LTE networks SHALL operate on any FirstNet roaming partner network using bands supported by the device." Recommendation 15 is further addressed in the Final Report's discussion of User Equipment and Device Management, section 4.2.1.3 at pages 47-48.

Recommended Requirement 15 may be interpreted to suggest that all NPSBN commercial roaming partner devices operating in a band must work for all NPSBN commercial roaming partner networks in that band, regardless of the technology implemented in the NPSBN commercial roaming partner network in that band. This result, which could lead to substantial cost increases for public safety devices, is not intended by the Technical Advisory Board. The

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<sup>1</sup> Public Safety and Homeland Security Bureau Makes Available the Recommendations of the Technical Advisory Board for First Responder Interoperability, PS Docket 12- 74, DA 12-811 (May 23, 2012).

intention is to require any NPSBN device operating on a commercial roaming partner LTE network also work on any other NPSBN commercial roaming partner LTE network that uses the same band. One NPSBN commercial roaming partner should not be able to configure its LTE devices to prevent them from working on another NPSBN commercial roaming partner LTE network on which the device is otherwise technically capable of obtaining service.

To resolve any ambiguity, the Technical Advisory Board recommends that the Commission consider modifying Requirement 15 to read as follows:

[15] All User Devices (UEs) deployed on the NPSBN that support roaming onto commercial LTE networks SHALL operate on any FirstNet roaming partner LTE network using bands supported for LTE by the device.

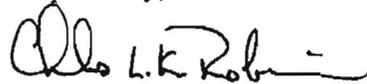
In addition, the language describing Recommended Requirement 15, found on page 48 of the TAB Report, should be revised as follows:

A device that is capable of obtaining LTE [such] service in certain bands shall operate on all FirstNet roaming partner LTE networks operating in those bands and not be locked to a subset of FirstNet roaming partner LTE networks operating in those bands.

The Technical Advisory Board appreciates the Commission's consideration.

Please call upon me if I can provide any information. My phone number is 704.432.3539. My address is c/o City of Charlotte, Business Support Services, 600 East Fourth Street, Charlotte, North Carolina 28202.

Respectfully,



Charles L. K. Robinson  
Chair

Technical Advisory Board for First Responder Interoperability