

27 June 2012

Via Electronic Filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *Notice of Oral Ex Parte Presentation, PS Docket No. 12-94.*

Dear Ms. Dortch:

On 25 June 2012, Bob Scott, Jake Slaughter, G.K. McDonald, and Michael McMenamain, on behalf of Raytheon, and Bill Malone, Scott Lane and Walt Leslie on behalf of Adams County Communication Center (“ADCOM 911”), Adams County, Colorado, participated in a phone call with Erika Olsen, Gene Fullano, and Brian Hurley of the Federal Communications Commission (“FCC”). The purpose of the meeting was to discuss the pending special temporary authority (“STA”) for ADCOM 911 and the status of the FCC’s decision about long term access to the 700 MHz public safety spectrum for the 21 Waiver recipients.

In the meeting, ADCOM 911 reiterated its June 19, 2012 written Ex Parte submission in the above referenced docket.¹ In sum, ADCOM 911 believes that logic dictates that until the 700 MHz public safety and D Block spectrum is transferred to the independent authority FirstNet that the status quo remains and Waiver jurisdictions should be allowed to continue to build. In the alternative, ADCOM 911 seeks the ability to operate its network under an STA on a six month renewable basis.

Today, the ADCOM 911 network is 81% paid for and is substantially complete. Specifically, the ADCOM 911 STA seeks partial use of the 18 site network, a total of eight sites for a six month period to test the network using the dedicated public safety and D Block broadband spectrum, (758-769 MHz/ 788/799).

The ADCOM 911 program requests six month renewable STAs for testing increasing levels of performance and capability. Figure 1 below shows a summary of the ADCOM schedule, due to complete in March of 2013. The urgency in obtaining the eight STAs has many facets as listed below:

¹ See ADCOM 911 Written Ex Parte, PS Docket No. 12-94 (June 19, 2012).

1. Key staffing resources on the program are at risk of being lost to other programs.
2. ADCOM 911 has timing constraints on reusing existing BTOP funding. A delay in STA approval means the BTOP funds will be lost on the LTE effort.
3. By getting the STAs and standing up the ADCOM 911 LTE system, NTIA, the FCC, FirstNet, ADCOM 911 and the public safety communications community stand to gain an incredible amount of experience and lessons learned from the ADCOM 911 program. Not getting the STAs in time will likely mean the ADCOM 911 program will terminate and the opportunity to provide lessons learned to FirstNet will be lost.
4. Due to the unpredictable nature of the weather in Colorado, it is advisable to install tower equipment during summer and early autumn months when tower climbing is safer.
5. ADCOM 911 believes that if the STAs are not approved prior to FirstNet being established in August of this year, the probability of near term access to the spectrum will be significantly reduced and the opportunity to provide an operational testbed to FirstNet will be lost.

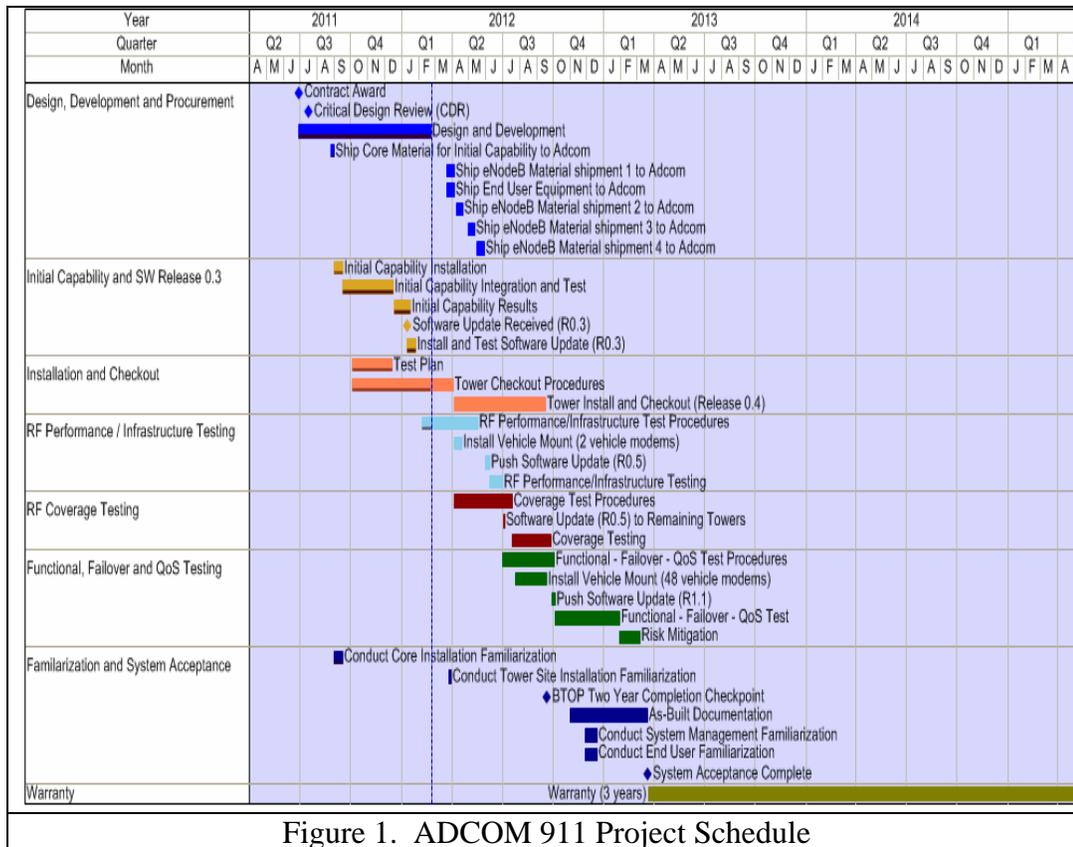


Figure 1. ADCOM 911 Project Schedule

ADCOM 911 has made considerable progress in design and development of the system and wishes to complete the remaining 19% of the LTE project. If the STAs are

not approved, \$2.28M (30% matching) of ADCOM 911 provided funding and \$5.31M (70%) of NTIA BTOP funding will be stranded and local political goodwill extinguished. All of the LTE equipment has been paid for and is held in three 40' storage containers at the ADCOM facility. The remaining program balance of \$1.9M will be used for installation, calibration, and testing of the LTE system.

In sum, ADCOM 911 seeks expedited grant by the FCC of the aforementioned STAs to resume a project that is in dire jeopardy of not completing and stranding hard earned tax payer dollars.

In accordance with Section 1.1206(b)(2) of the Commission's rules, this letter is being filed electronically with your office. Please contact the undersigned with any questions in connection with this filing.

Respectfully submitted,



cc: Charles Mathias
Erika Olsen
Gene Fullano
Brian Hurley

Regards, // Signed //

Jake Slaughter
Program Manager
Raytheon
Network Centric Systems