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

In the Matter of	)	**PS Docket No. 06-229**
Interoperability Showing for the Adams County	)	
Communication Center, Adams County,	)	
Colorado, for the development of a 700MHz	)	
Public Safety Broadband Network	)	

Interoperability Showing
Adams County Communication Center, Inc. (ADCOM 911)

Revision C
June 22, 2012

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1. Executive Summary

The Federal Communications Commission ("FCC") via the Waiver Orders that were adopted on May 12, 2010,[1] December 10, 2010,[2] and January 25, 2011,[3] PS 06-229 docket, provided guidance for achieving interoperability for the early deployments. Through the May 12, 2012 ("Waiver Order"), the Adams County Communication Center ("ADCOM 911") was granted permission by the FCC to develop a public safety Long Term Evolution ("LTE") data network using the 700 MHz public safety broadband spectrum (763-768 MHz and 793-798 MHz). Subsequently, the FCC issued the December 10, 2010 ("Interoperability Order"), which clarified requirements for the Interoperability Showing required before waiver recipients can go live with their networks. In addition, the FCC issued an Order on January 25, 2011 ("Third Report and Order") further clarifying network requirements for waiver recipients and sought additional comment.

ADCOM is currently designing and implementing a public safety data system in accordance with the aforementioned FCC Orders to complete its Interoperability Showing. ADCOM 911 has contracted with Raytheon Company to provide system integration services for the LTE system. Raytheon will be using hardware from IPWireless, Inc. for all LTE equipment. Based on the current schedule, ADCOM 911 expects its LTE network to be fully operational by spring of 2013. Once operational, the network will provide all data services to the first responders in the coverage area. A full project schedule is included in Appendix A.

As stated in the Waiver Order, ADCOM 911 is required to submit an Interoperability Showing outlining how it intends for its network to be interoperable with the future larger public safety network prior to launch of its network. ADCOM 911 herewith submits its Interoperability Showing Technical and Operational Response.

2. System Summary

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[1] *Requests for Waiver of Various Petitioners to Allow the Establishment of 700 MHz Interoperable Public Safety Wireless Broadband Networks*, PS Docket No. 06-229, Order, FCC 10-79 (rel. May 12, 2010)(See the following jurisdictions whose waivers were granted: State of Mississippi, LA-RICs, City and County of San Francisco, City of Oakland, City of San Jose, State of New Jersey, State of New Mexico, City of Charlotte, North Carolina, Adams County, Colorado, County of Maui, County of Hawaii, County of Kauai, City and County of Honolulu, and the State of Hawaii, City of San Antonio, Texas (State of Texas subsequently granted), City of New York, District of Columbia, New York State, City of Chesapeake, Virginia, City of Mesa, Arizona, Iowa Petition (including the Counties of Blackhawk, Buchanan, Dubuque, Grundy, Johnson, Marshall, and Scott and the City of Cedar Rapids), State of Alabama, City of Pembroke Pines, Florida, State of Oregon, City of Seattle, Calumet, Outagamie and Winnebago Counties, Wisconsin, and City of Boston).

[2] *Requests for Waiver of Various Petitioners to Allow the Establishment of 700 MHz Interoperable Public Safety Wireless Broadband Networks*, PS Docket No. 06-229, Order, FCC 10-2342 (rel. Dec. 10, 2010)

[3] *Service Rules for the 698-746, 747-762 and 777-792 MHz Bands*, WT Docket No. 06-150; *Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band*, PS Docket No. 06-229; *Amendment of Part 90 of the Commission's Rules*, WP Docket No. 07-100, (Rel.Jan. 26, 2011).

ADCOM 911 has designed an LTE solution to provide reliable public safety wireless broadband communications services for the Adams County area. The system architecture and design utilize existing infrastructure for eNodeB sites in most cases and a combination of new and existing microwave and fiber-optic infrastructure for network backhaul. It employs equipment that conforms to the latest version (Release 8) of the LTE standards for 3GPP Evolved Universal Terrestrial Radio Access ("E-UTRA"). The combination of using commercial LTE equipment, along with extensive existing infrastructure, creates an environment that will lend to efficient design and implementation that is both highly scalable and expandable.

Moreover, by utilizing the proposed design, and adhering to the interoperability requirements outlined by the FCC, the network can one day be integrated into a nationwide network. The open and scalable Evolved Packet Core ("EPC") will allow for both the expansion of the network on a state or regional level, as well as integration with other EPC's.

The initial network will support approximately 2,000 first responders across 1,200 square miles and cover at least 95% of the population base with outdoor modem coverage and 95% coverage reliability. The system will utilize 18 sites, with three eNodeB's per site, dispersed throughout the coverage area with a dedicated EPC located at ADCOM 911's facility in Commerce City, CO. As designed, the system will have no single point of failure (notwithstanding a catastrophic event at the ADCOM 911 facility).

The primary Network Operations Center ("NOC") will reside at the ADCOM 911 facility. As part of our contract we are implementing full system management applications on both the LTE and underlying IP network. All elements of the network will have remote monitoring enabled that will automatically notify ADCOM 911 personnel in the event of a hardware failure or system interruption. Between ADCOM 911 and its vendors, the system will have 24x7x365 support and will be remotely accessible for all functions.

An overall network design diagram is included in Appendix B.

3. Coverage and Performance

As part of ADCOM 911's contract, Raytheon and IPWireless have committed to including all necessary tests to certify coverage, capacity and performance metrics as required by the Waiver Order, Interoperability Order, and the Third Report and Order. ADCOM 911 commits to submitting these tests and certifications within 30 days after going live as defined in the Waiver Order. Additionally, all performance, coverage and capacity specifications outlined below will be available at the time the network is initially operational ("Day One") under the Waiver Order, Interoperability Order and the Third Report and Order.

3.1. Overall System Performance (Interoperability Order, ¶ 22)

Radio network planning and baseline operability requirements for the system design assumes the application of a minimum cell edge user data rate of 768kbps on the downlink and 256kbps on the uplink with 70 % Sector loading for devices operating outdoors. ADCOM 911 will certify its compliance with these requirements in the quarterly report that follows our date of service availability. As requested, ADCOM 911 will provide Uplink ("UL") and Downlink ("DL") plot maps that specify the specific performance levels derived from our acceptance test data and will include 256 Kbps UL and 768 Kbps DL.

3.2. Coverage (Interoperability Order, ¶ 23)

In designing the proposed network, ADCOM 911's goal is to meet the FCC's requirement that "significant population coverage" be achieved. Due to Adams County's unique geographic make-up, the county was broken down into two sub-sections to allow for a more in-depth analysis. The two areas that make up the county are identified as West Adams County and East Adams County, with the west portion defined roughly as the western third of the county and the eastern portion the remainder. The west portion, which contains approximately 99% of the population, is a mix of suburban, commercial and industrial development while the east portion is an extremely rural, sparsely populated area. Our analysis and coverage estimates show results for both portions independently as well as the aggregated countywide coverage area.

For the actual coverage modeling, ADCOM 911 employed two use-cases for end-user scenarios. The first is a USB dongle attached to a laptop, mounted inside a vehicle. The second scenario is a trunk-mounted modem with an external antenna mounted to the outside of the vehicle. These scenarios represent the two actual use-cases that ADCOM 911 will go live with. The technical specifications for each are listed below.

USB Dongle

- **Tx Power:** 0.2W
- **In-Vehicle Loss:** -6dB

Mobile Modem

- **Tx power:** 0.2W
- **Antenna Gain:** 3dBd / 5.15dBi
- **Cable Loss:** 0.6dB
- **Tx/Rx height above ground:** 4 ft
- **Rx Sensitivity:** -109dBm

Overall County Coverage

When looking at the coverage for the overall county, our proposed system meets the FCC's goals of "significant population coverage". Based on our models we expect to cover 95% of the population with dongle uplink coverage and 97% with modem uplink coverage. With regard to geographic area, the proposed system will cover 56% of the area with dongle uplink and 70% with modem uplink. When focusing on the population center of the county (West area), those coverage numbers increase to 79% and 87% respectively. The table below summarizes the statistics (all references are to uplink coverage that meets the minimum standard and are estimates).

	% Population with Dongle	% Population with Modem	% of Area with Dongle	% of Area with Modem
Adams County (all)	95%	97%	56%	70%
West Adams County	N/A	N/A	79%	87%
East Adams County	N/A	N/A	44%	61%

Full coverage maps are included in Appendix C.

In looking at future system growth, we will focus our efforts on increasing capacity and coverage in the West Adams County area. The initial efforts will look to solve any "holes" within the coverage area that affect first responder activities. In regards to the East Coverage area, we do not anticipate additional resources becoming available in the near future. As stated, the area is extremely rural with a majority of the land being privately owned.

3.2.1. Coverage Reliability (Interoperability Order, ¶ 24)

The coverage percentages provided in previous table assumed 95% reliability in the model. All modeling, coverage maps and testing procedures have and will use this reliability parameter. ADCOM 911 will utilize TSB-88 methods for its reliability testing and submit all results once complete.

3.3. Capacity (Third Report and Order, ¶ 63-64)

Based on our modeling, the overall network capacity will meet FCC throughput requirements. The following outlines the capacity of each element of the system:

- **eNodeB Access Point:** Based on the current specifications of LTE we are designing our system to have a capacity of 45 Mbps at each access point (3 sectors at 15 Mbps each), sufficient to support more than the normal LTE average throughput in the 10 MHz public safety broadband spectrum.
- **Microwave Backhaul:** The minimum microwave capacity within the system will be 150 Mbps
- **Fiber Backhaul:** All elements of the fiber network will support 1 Gbps
- **Hardware:** Any hardware (CPU, Router, Switch) will have a minimum throughput capacity of 1 Gbps

3.4. eNodeB Site Availability

A majority of the tower sites in ADCOM 911's initial design have both UPS battery backup for short-term loss of power and generator backup for long-term availability. For sites with generators, the batteries are sized to provide a minimum of 15 minutes of backup to allow the generators time to come on-line. The three sites that do not have generator capability have 8-hour UPS batteries as backup.

4. Hosted Applications (The Waiver Order, ¶ 46)

ADCOM 911 will comply with the requirement to maintain the five standard applications as identified in the Waiver Oder. Outlined below is how ADCOM 911 intends to manage each:

- **Internet Access:** ADCOM 911 will utilize its existing Internet portal connection to offer Internet access to all users. All access will be filtered through proxy server to ensure proper use.
- **VPN:** ADCOM 911 will support any standard VPN protocol for all internal users and roaming users. ADCOM 911 will simply provide the open internet connection, as discussed above, and allow clients to create VPN sessions with hosts addressed to the public Internet.
- **Status Homepage:** ADCOM 911 will default the users web browser to a network portal page that will summarize any current major events.
- **ICS Use:** Through the core Internet access, and any private connections that exist, ADCOM 911 will allow all ICS users to access the system and communicate to any third party networks.
- **Field Base Server Applications:** One of ADCOM 911's primary uses for the system will be the implementation of its Computer Aided Dispatch ("CAD"),

Records Management ("RMS") and Jail Management ("JMS") systems. These applications are all server-based and will be active for any ADCOM 911 user and have already been successfully tested using an LTE device.

Regarding additional applications, ADCOM 911 has designed the system to allow for interfaces to LMR, PSTN and other systems. However, they will not be implemented in our initial operational deployment. As the agencies we serve require this functionality we will upgrade the system. The same is true for applications such as messaging ("SMS").

5. Roaming and Interoperability

5.1. Public Safety Roaming on Petitioners' Networks (Third Report and Order, ¶¶ 35-37)

ADCOM 911 commits to having the technical capability to roam and interoperate with other practitioners' networks at the date of initial service. The ADCOM 911 system has the flexibility to support the two primary roaming architectures as defined in Figures 1 and 2 of the FirstNet Interoperability Board Final Report. These figures are provided below for reference.

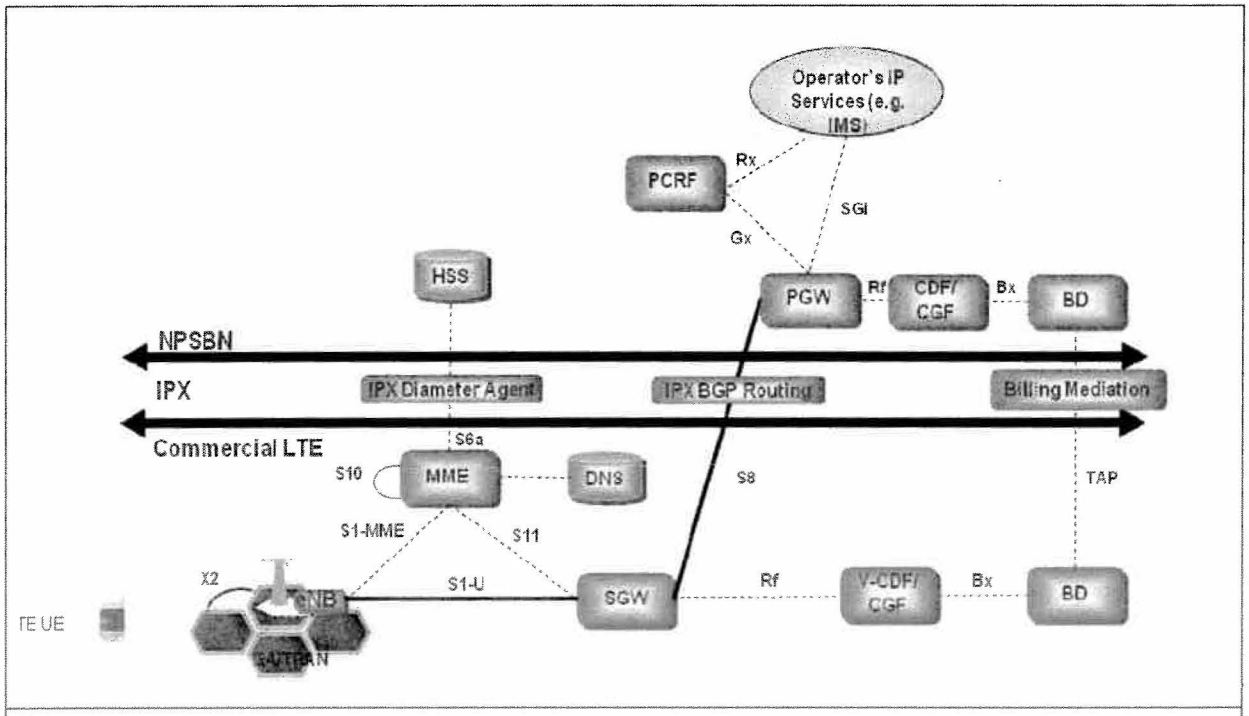


Figure 1 – Roaming using Home-Routed APN

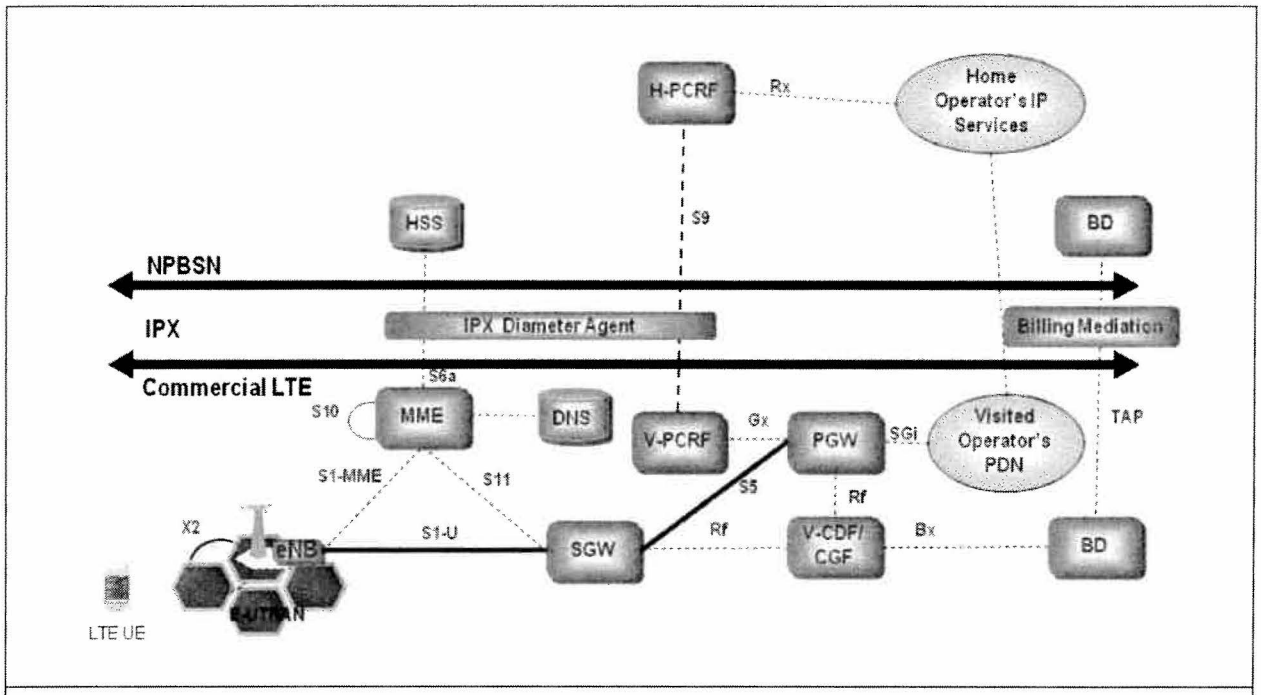


Figure 2 – Roaming using Local Breakout APN

[redacted]

[redacted]

5.2. Handover (Third Report and Order, Sect. ¶ 47)

The objective of the ADCOM 911 network is to provide mobile broadband service. As such, ADCOM 911 agrees with the FCC that the network must support seamless handover between eNodeB's in the ADCOM 911 coverage area. The LTE equipment supports both S1 and X2 based handover mechanisms, and supports vehicular mobility at speeds up to 217mph (350kmph), per the standard. The network RF design provided by ADCOM 911's system integrator provides sufficient levels of cell overlap for handover, and will be further optimized during deployment to guarantee mobility.

Handover to neighboring jurisdictions will be a future consideration for when adjacent entities pursue their own network build-outs. When this occurs, ADCOM 911 is prepared to coordinate with adjacent networks as needed. ADCOM 911 recognizes that roaming can be achieved with neighboring jurisdictions with or without seamless mobility. If feasible and operationally necessary, ADCOM 911 will coordinate to achieve seamless mobility. The type of coordination is dependent on a variety of factors including network identifiers, regional EPC architecture, and RF planning coordination. Should inter-jurisdiction mobility be pursued, ADCOM 911 believes seamless handover can effectively be achieved via S1-based mechanisms, thereby eliminating unnecessary coordination to configure peered X2 connections.

5.3. Roaming on Commercial Networks

[redacted]

[redacted]

[redacted]

[redacted]

6. Technology Platform and System Interfaces (Third Report and Order, ¶ 12)

Our LTE system design implements LTE Release 8 and the associated interfaces. As required by the Third Report and Order, the ADCOM 911 LTE network will support the following system interfaces in order to ensure support of the public safety applications and roaming capabilities specified in the applicable FCC orders. These required interfaces include:

- **Uu** – LTE air interface
- **S6a** – Visited MME to Home HSS
- **S8** – Visited SGW to Home PGW
- **S9** – Visited PCRF to Home PCRF for dynamic policy arbitration
- **S10** – MME to MME support for Category 1 handover support
- **X2** – eNodeB to eNodeB1

Furthermore, as required by ERIC, the equipment is able to support additional standards-compliant interfaces. These interfaces include:

- **S1-u** – between eNodeB and SGW
- **S1-MME** – between eNodeB and MME
- **S5** – between SGW and PGW
- **S6a** – between MME and HSS
- **S11** – between MME and SGW
- **SGi** – between PGW and external PDN
- **Gx** – between PGW and PCRF (for QoS policy, filter policy and charging rules)
- **Rx** – between PCRF and Application Functions located in an external PDN
- **Gy/Gz** – offline/online charging interfaces

The proposed EPC and eNodeB products are capable of supporting either IPv4 or IPv6. While we plan to initially configure our network for IPv4 operation (due to legacy network and application architecture used by ADCOM 911), all equipment is IPv6 ready. At the time IPv6 support is required, ADCOM 911 will implement the proper network translations for the LTE network. This approach reduces setup and maintenance costs, as use of IPv4 allows interfacing to the Internet and the current public safety base of equipment without

the need for IPv4-to-IPv6 translation techniques, while at the same time requiring no new equipment costs should a future upgrade to IPv6 be warranted.

By adopting and committing to the 3GPP standards, ADCOM will ensure that all future releases are backward compatible with devices and applications in-line with the 3GPP framework.

7. System Identifiers (Interoperability Order, ¶¶ 14-16)

As described in the Interoperability Order, a requirement of 3GPP-based networks is the implementation of a Public Land Mobile Network identifier ("PLMN ID"). ADCOM will use the single PLMN ID granted to public safety and therefore become part of the single nationwide public safety broadband network.

8. System/Device Testing

As previously stated, the vendors used by ADCOM 911 have signed the Creative Research And Development Agreement ("CRADA") with the PSCR and committed to having all hardware (both UE and Infrastructure) participate in the demonstration network. In addition, ADCOM 911 has required that all test results from the demonstration network testing be shared with us.

8.1. Conformance Testing (Interoperability Order, ¶ 17-18)

Conformance testing in the 3GPP community is specific to User Equipment. In order to ensure all User Equipment complies with 3GPP Release 8, ADCOM 911 will perform all necessary testing specified in the Interoperability Order. The schedule for these tests will be in compliance with the timing specified in paragraphs 17 and 18 of the order.

8.2. Interoperability Testing (Interoperability Order, ¶ 19-20)

Since this network will eventually be part of the nationwide public safety network, ADCOM 911 understands and agrees with the importance of Interoperability Testing ("IOT"). ADCOM 911 will ensure that its equipment vendors certify that the LTE network supports the Interoperability interfaces specified by the Commission (Uu, S6a, S8, S9), and will provide an IOT test plan in the first Quarterly Report following the date of Service Availability, as required by the Commission.

We recognize that there is currently no agreement or rules on the national interoperability architecture, no standards for IOT testing, and no other public safety LTE systems to test with at this time. Therefore, we will commit to re-evaluating our IOT plan as statutory and regulatory requirements evolve. The PSCR is currently developing test and use-cases to validate the Interoperability functions.

As additional public safety networks are developed, ADCOM 911 will commit to developing agreements with the operators to perform IOT tests as necessary in accordance with rules in force at the time. As previously mentioned, we would propose setting up point-to-point VPN connections over the public Internet between each EPC. While this is not an optimal configuration for long-term interoperability, it should provide the minimal requirements for IOT. We will then exchange UE devices with that operator and, following the Commission's interoperability requirements, begin to validate the specific 3GPP interfaces and functionality.

9. System Use

9.1. Quality of Service (QoS) and Priority (Third Report and Order, ¶¶ 43-47)

ADCOM 911 believes a properly designed QoS and Priority framework are key for the success of the network. As part of its contract, ADCOM 911 will work with its vendors to establish the best framework for our network. The initial use of the network will be for first responders only (as defined in section 337 of the Communications Act of 1934, as amended),[4] so we will focus our efforts on the levels of need within the first responder community. We anticipate developing QoS levels both for function and application, and will submit our QoS and Priority scheme as soon as it is developed.

9.2. Operation of Permanent Fixed Stations *(Interoperability Order, ¶ 20)*

ADCOM 911 agrees with the FCC's position that the 700MHz spectrum identified for the LTE network is best suited for mobile applications. ADCOM 911 agrees and will commit to ensuring that any fixed-point devices on the network will be utilized on a ancillary basis, and will ensure any such devices are managed in terms of prioritization and capacity usage so as to not impact mission-critical mobile applications.

10. Security and Encryption (Interoperability Order, ¶ 25)

10.1. Network Access Security

The ADCOM 911 LTE network provides the security mechanisms specified in 3GPP TS 33.401, namely "integrity protection and verification of data" and "ciphering/deciphering of data," for signaling mechanisms required by the Commission in the Interoperability Order. Specifically, the following are supported:

[redacted]

[4] 47 U.S.C. § 337.

[redacted]

In order to support user end-to-end security, user VPN encryption is supported by ADCOM 911. This assures user security through all elements of the network, including the radio access network, backhaul, and core network. While the proposed LTE system will pass VPN traffic transparently, we are working with our vendors to ensure that that the LTE system is able to differentiate traffic within a VPN tunnel in order to provide the QoS function.

10.2. Application Security

All existing ADCOM 911 applications that will be accessible from this network currently require user authentication and will continue to do so. Additionally, some applications are tied to specific IP address ranges that ADCOM 911 maintains. For roaming users, we will only require LTE based authentication against their home HSS. Any security for roaming users home applications would be the responsibly of their home networks

11. Spectrum Use

11.1. Interference Mitigation (Interoperability Order, ¶ 26)

[redacted]

[redacted]

[redacted]

11.2. Out of Band Emissions (Third Report and Order, ¶ 26)

The LTE eNodeB and UE being deployed by ADCOM 911 comply with the Emission Limitations defined by the FCC. Transmitters will meet the 43 + 10 log (P) dB and associated measurement bandwidths in both uplink and downlink allocations.

12. Land Mobile Radio (LMR) Interface and Interference (Third Report and Order, ¶ 58)

The network being developed by ADCOM 911 will be capable of interfacing with the existing statewide LMR system through an Inter RF Subsystem Interface ("ISSI"), and the technical design being developed anticipates this interface in the near future. In addition, current technical limitations on the LMR network prevent the proper interfacing of the two systems at this time. ADCOM 911 is currently working with the governing entity of the LMR network to address these technical issues and develop a long-term strategy for interfacing the two networks.

ADCOM 911 currently owns and operates a 700MHz simulcast trunked radio system in the same coverage area as the proposed LTE system. ADCOM 911 will run the appropriate analysis and will perform the necessary testing to ensure there is no interference with the system.

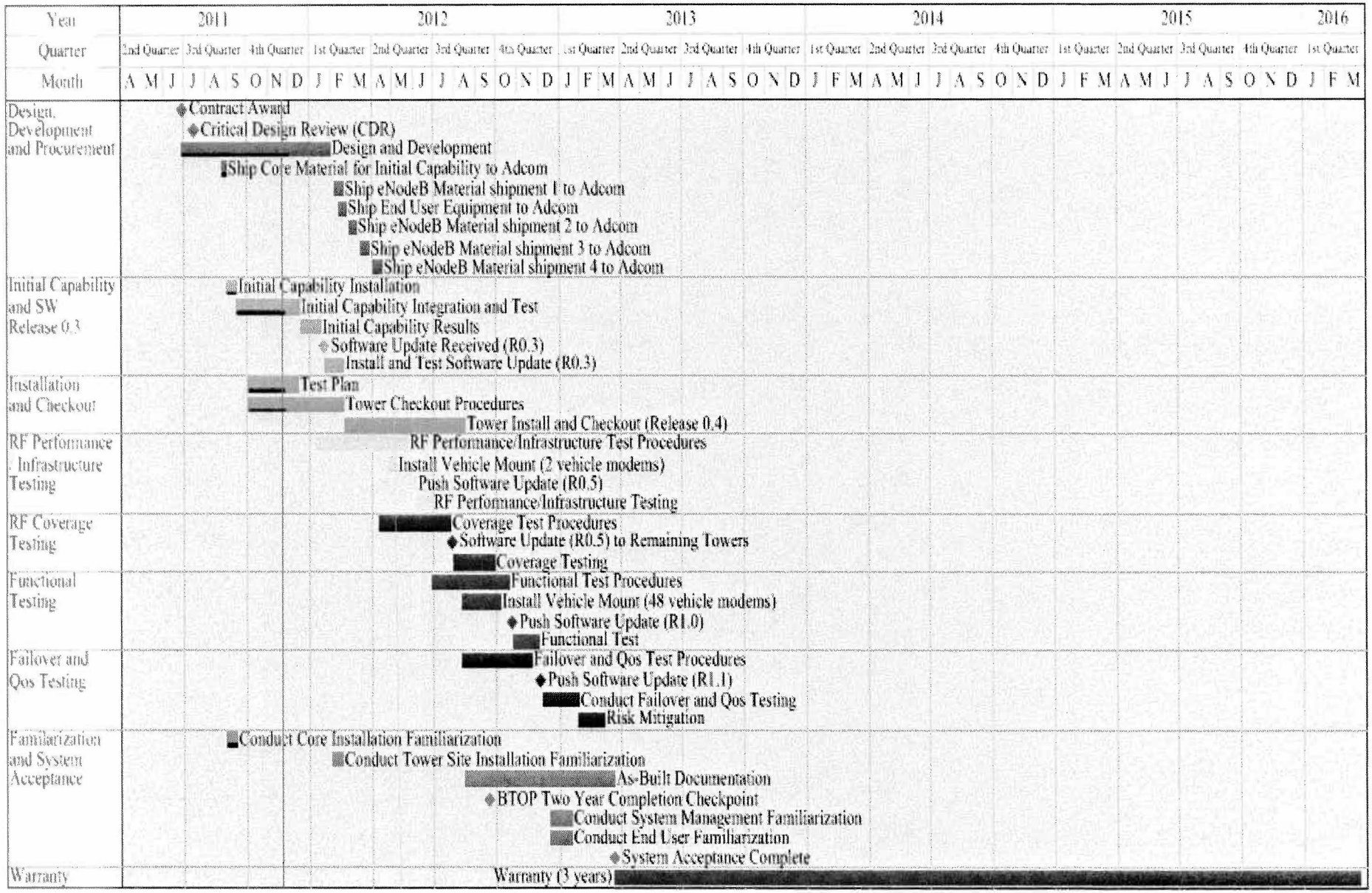
13. State Coordination and Future Growth

It has been, and continues to be, ADCOM 911's intention that the network being developed in Adams County will quickly expand into a statewide, and potentially regional network. Due to this, ADCOM 911 continues to be in close coordination with the State

through its Office of Information Technology ("OIT") and the Statewide Interoperability Executive Committee ("SIEC"). ADCOM 911 communicates all major activities and milestones with these groups, and is beginning the work to develop a statewide governance model. A letter from the State OIT is included in Appendix D.

ADCOM 911 is already working with multiple entities outside of the initial design, including the City and County of Denver and the City of Thornton, to expand the reach of the network. As part of ADCOM 911 fiber-optic infrastructure plan, we are working to interconnect as many neighboring communities as possible, in order to provide the necessesary backhaul to the EPC. Once a general governance model is in place, we expect multiple communities to actively pursue adding their own eNodeB sites to the network, which will expand both coverage and capacity.

Appendix A: Project Schedule

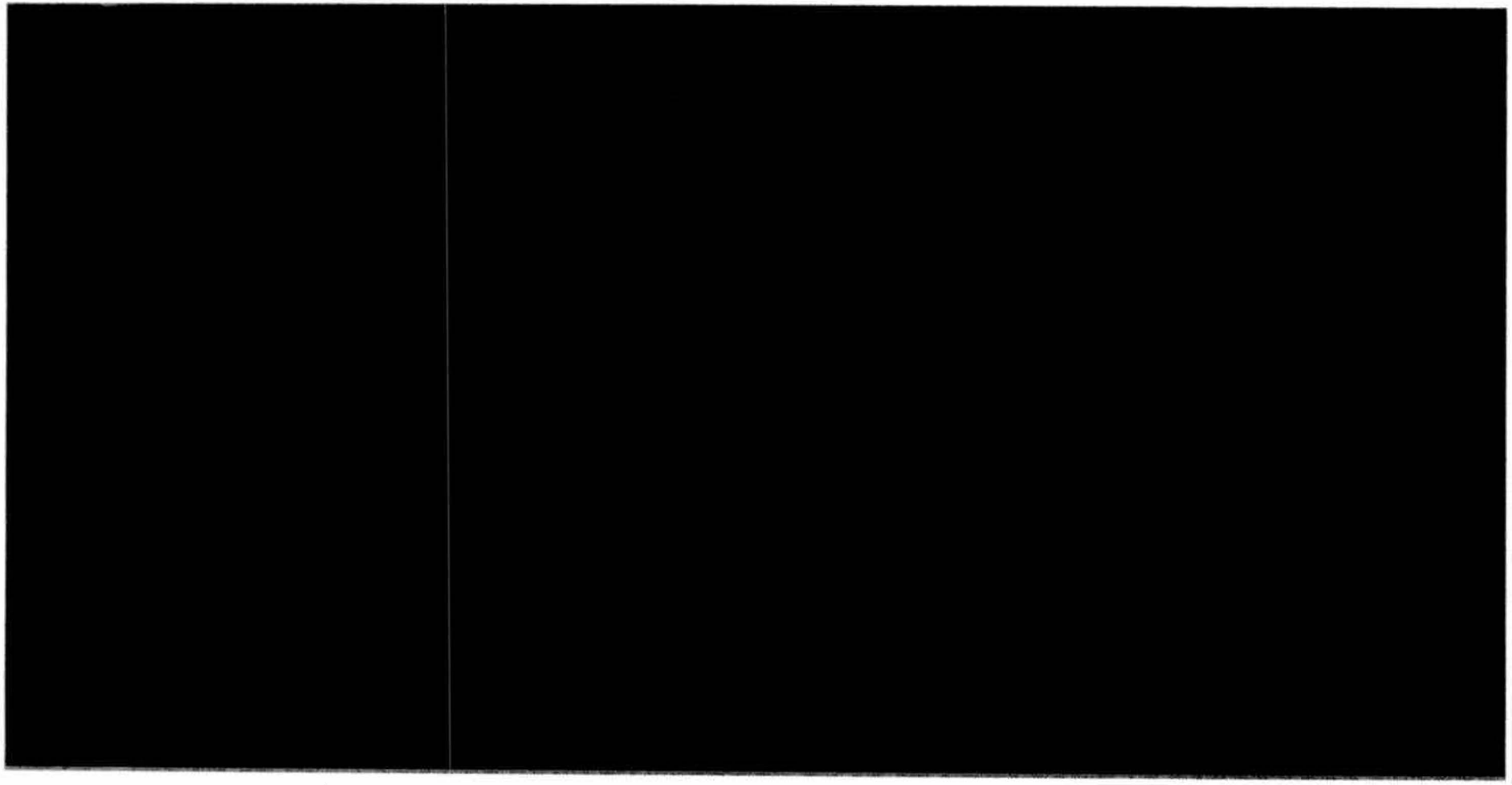


Appendix B: Network Architecture Diagram

[redacted]

Appendix C: Network Coverage Maps

ADCOM 911 LTE Network
Coverage
Mobile Modem Downlink



Key

RF Coverage modeled at 756 kbps Downlink and 256 kbps Uplink at 70% site load.

- eNodB Site

ADCOM 911 LTE Network
Coverage
Mobile Modem Uplink

[redacted]

Key

RF Coverage modeled at 756 kbps Downlink and 256 kbps Uplink at 70% site load.

- eNodB Site

ADCOM 911 LTE Network
Coverage
USB Dongle Downlink

Key

RF Coverage modeled at 756 kbps Downlink and 256 kbps Uplink at 70% site load.

- eNodB Site

ADCOM 911 LTE Network
Coverage
USB Dongle Uplink

Key

RF Coverage modeled at 756 kbps Downlink and 256 kbps Uplink at 70% site load.

- eNodB Site

Appendix D: Letter of Coordination from State Office of Information Technology

STATE OF COLORADO

GOVERNOR'S OFFICE OF INFORMATION TECHNOLOGY

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www.colorado.gov/oit

John W. Hickenlooper
Governor

Kristin Russell
Secretary of Technology and
State Chief Information Officer

November 28, 2011

To Whom It May Concern:

Please accept this letter as affirmation that the Adams County Communications Center (ADCOM 911) has been working in cooperation with the State of Colorado, Governor's Office of Information Technology (OIT) and the Statewide Interoperability Coordinator (SWIC), as it has been developing and implementing its Long Term Evolution (LTE) Public Safety Broadband initiative and project.

OIT supports ADCOM's efforts and considers them a partner in all aspects of public safety communications.

Thank you,

Peter Baggs
Public Safety Communications Network Manager
Governor's Office of Information Technology

Clint Goldenstein
Statewide Interoperability Coordinator
Governor's Office of Information Technology

STATE OF COLORADO

OFFICE OF THE GOVERNOR

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John W. Hickenlooper
Governor

June 8, 2012

Lawrence E. Strickling
Assistant Secretary for Communications and Information and
Administrator, National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Ave., NW
Washington, DC 20230

Dear Assistant Secretary Strickling:

On behalf of the State of Colorado, I am writing to express our state's support for the Adams County Communication Center (ADCOM 911) public safety BTOP grant project and request the project be allowed to proceed and become operational.

We appreciate the NTIA's efforts in championing the Nationwide Public Safety Broadband Network (NPSBN) and understand the difficulties created by future uncertainty. However, we believe the current realities faced by first responders call for compromise when addressing the complex decisions between long-term goals and immediate impacts. By all realistic estimates, it will be three years before FirstNet can offer service to the first responders of Adams County and Colorado. Unfortunately, they cannot wait that long. As we are all aware, the data networks currently available to first responders do not meet their needs. The proposed Long Term Evolution (LTE) network being developed by ADCOM 911, which is scheduled to be operational in less than a year, can help save lives and protect the citizens of Adams County and Colorado. We believe the acuteness of this impact warrants the project move forward quickly.

We appreciate the efforts of the NTIA to be good stewards of public funds, however, in analyzing the financial impact of the ADCOM 911 project, it appears that there is minimal financial risk in immediate action. All LTE related equipment, which is the focal point of the suspension, has already been purchased. It is also our understanding that ADCOM 911 has

commitments from all vendors involved that the network will be interoperable with the NPSBN. By delaying the start of the project, the NTIA, in essence, is stranding assets already paid for.

We again want to express our appreciation for the efforts of the NTIA on this most important issue. Working together, the NTIA, states and local public safety representatives have accomplished a tremendous amount in the past two years. Allowing the ADCOM 911 project move forward is a financially prudent, technologically sound decision that will help protect the citizens of Adams County and Colorado.

Thank you for your time and consideration on this matter.

Sincerely,

John Hickenlooper
Governor