



March 25, 2013

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

Re: *Ex Parte* Submission – PS Docket No. 12-94; PS Docket No. 06-229;  
WT Docket No. 06-150

Dear Ms. Dortch:

On Thursday, March 21, 2013, Danielle Coffey and Mark Uncapher of the Telecommunications Industry Association (“TIA”),<sup>1</sup> along with Kevin Krufky of Alcatel-Lucent, Derek Khlopin of Nokia Siemens Networks, Michael Paroby of EADS-N.A./Cassidian Communications, Chuck Powers of Motorola Solutions, Mark Racek of Ericsson and Patrick Sullivan of Harris met with David S. Turetsky, Chief of the FCC’s Public Safety and Homeland Security Bureau (“PSHSB”), in addition to Gene Fullano, Brian Hurley, and Erika Olsen of PSHSB.

In this meeting, TIA outlined the concerns expressed in TIA President Grant Seiffert’s recent letter to Chairman Genachowski regarding the freeze in equipment authorizations for Band 14 products. This letter, dated February 25, 2013, is appended to this *ex parte* notice.

The industry representatives lauded the March 8<sup>th</sup> release of the Commission’s 700 MHz Public Safety Broadband NPRM.<sup>2</sup> While paragraph 33 of the NPRM makes explicit a suspension of the acceptance and processing of any new equipment authorizations in the public safety broadband bands, the main concern raised in the February 25<sup>th</sup> letter, the representatives expressed their understanding of the legal context requiring a proceeding and their appreciation for the movement toward addressing their concerns.

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<sup>1</sup> TIA is a Washington, DC-based trade association and standard developer that represents the global information and communications technology (ICT) industry through standards development, advocacy, tradeshow, business opportunities, market intelligence and world-wide environmental regulatory analysis. For over eighty years, TIA has enhanced the business environments for broadband, mobile wireless, information technology, networks, cable, satellite, and unified communications. TIA represents approximately 500 participating companies producing products and services empowering communications in every industry and market, including healthcare, education, security, public safety, transportation, government, the military, the environment, and entertainment. TIA is an accredited standard development organization for the ICT sector by the American National Standards Institute (ANSI).

<sup>2</sup> 700 MHz Public Safety Broadband *Notice of Proposed Rulemaking*, PS Docket No. 12-94; PS Docket No. 06-229; WT Docket No. 06-150 (rel. March 8, 2013) (“NPRM”).

The representatives stressed the importance for the Commission, as well as other entities involved in the process such as the First Responder Network Authority (FirstNet), to act on this issue in a timely manner so that the public safety community's demand for National Public Safety Broadband Network-ready Band 14 LTE devices can be met. It was also noted that, because LTE is already a well-understood standard, industry can anticipate FirstNet's final requirements.

TIA also noted that there are First Responders with existing broadband devices, such as 3G devices used on commercial networks, are near, or at, the end of the product lifecycle. These jurisdictions want to secure products with LTE capability on a commercial band, while avoiding possible future duplicative costs, by obtaining Band 14-ready devices before the National Public Safety Broadband Network is operational. The uncertainty resulting from not having technical and services rules in effect for operation in Band 14 also impacts the product development cycle, such as the availability of chipsets for integration to user devices.

Pursuant to Section 1.1206 of the Commission's rules,<sup>3</sup> this letter is being electronically filed via ECFS and a copy of this submission is being provided electronically to the meeting attendees.

Respectfully submitted,

**TELECOMMUNICATIONS INDUSTRY ASSOCIATION**

By: /s/ Danielle Coffey

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cc: David S. Turetsky, Chief, PSHSB  
Gene Fullano, PSHSB  
Brian Hurley, PSHSB  
Erika Olsen, PSHSB

Attached: TIA President Grant Seiffert's February 25, 2013, letter to Chairman Genachowski

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<sup>3</sup> 47 C.F.R. § 1.1206.