



February 25, 2013

The Honorable Julius Genachowski  
Chairman  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

Dear Chairman Genachowski:

On behalf of the Telecommunications Industry Association's (TIA) members, many of whom are driving innovation to deliver cutting edge LTE technologies for first responders, I urge you to restart the equipment authorization process for Band 14 products. The informal freeze on processing certification applications for Band 14 infrastructure and devices is frustrating the plans of jurisdictions that wish to deploy public safety broadband networks consistent with the approval of both the Federal Communications Commission (Commission) and the First Responder Network Authority (FirstNet).

TIA and its members laud the efforts of the Commission, FirstNet, and the National Telecommunications and Information Administration (NTIA) to create a Nationwide Public Safety Broadband Network (NPSBN) that is interoperable at the network and device levels. Prior to the Commission's transfer of the Public Safety Broadband License for the 758-769 MHz and 788-799 MHz bands (700 MHz Public Safety Band) the Commission was processing Band 14 devices through its equipment authorization processes. Many of these previously approved products, some manufactured by TIA members, have been used by first responders and Federal experts in test scenarios and early deployment networks to demonstrate the value of the NPSBN and Long-Term Evolution (LTE) technology to help first responders execute their duties.

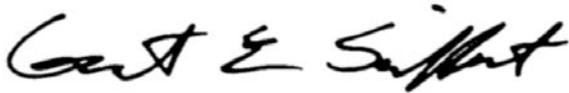
However, upon transfer of the 700 MHz Public Safety Band license to FirstNet, equipment authorizations approvals for Band 14 products were frozen. TIA believes that the Commission's approval process should recommence for Band 14 products as was the custom prior to November 15, 2012. The lack of regulatory certainty caused by the equipment authorization freeze has the potential to chill investment in research and development for first responder LTE technology. Moreover, the freeze affects the ability of manufacturers to meet near-term demand for NPSBN-ready Band 14 LTE devices. For example, First Responders in several jurisdictions want to purchase devices now with Band 14 capabilities. Their existing broadband devices, including 3G devices used on commercial networks, are near or at the end of the product lifecycle. Jurisdictions across the country want to maximize costs of replacement devices and secure products with LTE capability on a commercial band as well as Band 14 so that they do not need to buy new broadband devices when the NPSBN is operational.

To ensure continued investment in LTE products for first responders, meet the near-term demand among them for cutting-edge technology, and further the shared goal of creating an interoperable NPSBN, TIA requests that the Commission immediately restart the Band 14 equipment authorization process. Existing FCC requirements now used for the approval of Band 13 devices provides an appropriate framework for Band 14 and will give assurance for quality, safety, and interoperability. Moreover, Section 4.3.2.6 on Device Test Life Cycle of the Technical Advisory Board for First Responder Interoperability's *Recommended Minimum Technical Requirements to Ensure Nationwide Interoperability for the Nationwide Public Safety Broadband Network* provides a clear path to device testing that could inform the Commission on this matter.

TIA once again thanks you and the Commission for your tireless efforts to ensure that first responders have broadband technologies that will make their operations even more effective. TIA believes that, to continue this effort, Band 14 equipment authorization must recommence.

I appreciate your prompt consideration of this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Grant E. Seiffert". The signature is fluid and cursive, with the first name "Grant" being the most prominent.

Grant Seiffert  
President  
Telecommunications Industry Association

Cc: Sam Ginn, First Responder Network Authority (FirstNet) Board Chairman  
Lawrence Strickling, Assistant Secretary for Communications and Information and  
Administrator, NTIA