



April 8, 2013

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

FILED/ACCEPTED

APR - 8 2013

Federal Communications Commission
Office of the Secretary

Re: Petition for Reconsideration
FCC ID WT7PTRNKTBSR75800

Written *Ex Parte* Presentation
WT Docket No. 11-69

Dear Ms. Dortch:

Motorola Solutions Inc. ("MSI") respectfully requests the withdrawal of its Petition for Reconsideration of the above-referenced grant of equipment authorization issued to Teltronic S.A.U. ("Teltronic").¹

In its reply to the MSI Petition for Reconsideration, Powertrunk, Inc. ("Powertrunk"), a subsidiary of Teltronic, indicates that the subject authorization is limited to the 854-869 MHz band and does not include the National Public Safety Advisory Committee ("NPSPAC") channels at 851-854 MHz.² Given Powertrunk's acknowledgement that "TETRA equipment is excluded from NPSPAC", MSI asks that its Petition for Reconsideration be withdrawn.³ While the issue of whether Powertrunk's equipment would be permitted to operate on any 800 MHz public safety channels remains open, MSI is willing to await the Commission's response to its request for clarification on this matter.⁴ Any further restrictions on the scope of

¹ Letter from Chuck Powers, Motorola Solutions, Inc. to Marlene H. Dortch, Secretary, Federal Communications Commission, FCC ID WT7PTRNKTBSR75800, dated February 25, 2013 ("MSI Petition for Reconsideration").

² Letter from Jose Martin, Powertrunk, Inc. to Marlene H. Dortch, Secretary, Federal Communications Commission, FCC ID WT7PTRNKTBSR75800, dated March 21, 2013, at 2 ("Powertrunk Reply")

³ *Id.*

⁴ Petition for Clarification and/or Reconsideration filed by Motorola Solutions, Inc., WT Docket No. 11-69, submitted Nov. 9th, 2012.



Powertrunk's equipment authorization can be detailed there. MSI urges the Commission to respond to that request expeditiously.⁵

In addition, the response of Powertrunk distinguishes its D-LMR and TETRA technologies and points out that its D-LMR equipment is "expressly not within the scope" of the Commission's Report and Order in WT Docket No. 11-69.⁶ In so doing, Powertrunk appears to be implying that its D-LMR technology is not prohibited from operation on the NPSPAC channels as is TETRA. This issue should have been clarified in the aforementioned Report and Order, however, the Commission instead deferred consideration of the authorization and use of TETRA variant technologies such as D-LMR.⁷ Given the potentially adverse impact that could result in terms of interference and interoperability from having non-compliant digital technologies operate on the 800 MHz NPSPAC channels, the FCC must address these pending issues as soon as possible. This includes resolving the issues raised by Harris Corporation ("Harris")⁸ concerning the applicability of the Section 90.209 "B mask" to 800 MHz digital technologies and, also, addressing the requests of both MSI and Harris that the Commission affirm the requirement that all equipment authorized to use the NPSPAC channels must be capable of operating in the analog mode on the 800 MHz mutual aid channels.⁹

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Chuck Powers', written over a horizontal line.

Chuck Powers
Director, Engineering and Technology Policy
Motorola Solutions, Inc.
1455 Pennsylvania Avenue, N.W.
Washington, DC 20004

CC: Rashmi Doshi, Chief,
Laboratory Division, Office of Engineering and Technology

⁵ MSI's Petition for Clarification and/or Reconsideration raises additional questions on the applicability of the Commission's rules to digital technologies other than TETRA. These issues require resolution as well.

⁶ Powertrunk Reply at 2.

⁷ Amendment of Part 90 of the Commission's Rules to Permit Terrestrial Trunked Radio (TETRA) Technology and Request by the TETRA Association for Waiver of Section 90.209, 90.210, and 2.1043 of the Commission's Rules, Report and Order, WT Docket No. 11-69, ET Docket No. 09-234, 77 FR 61535 at ¶ 13.

⁸ Petition for Rulemaking, Harris Corporation, WT Docket No. 11-69, dated April 30, 2012.

⁹ *Id.* See also, Letter from Chuck Powers, Motorola Solutions, Inc. to Marlene H. Dortch, Secretary, Federal Communications Commission, WT Docket No. 11-69, dated May 30, 2012.



MOTOROLA SOLUTIONS

Certificate of Service

On April 8, 2013, I caused a copy of the foregoing Petition for Reconsideration to be sent by first class mail to the following:

Jose Martin
Executive Vice President
Powertrunk Inc.
590 Madison Ave
21st Floor
New York, NY 10022

Jose Roman Gimeno
Certifications & Services Area Manager
TELTRONIC S.A.U.
Poligono Malpica, calle F Oeste
50057 Zaragoza Spain

A handwritten signature in black ink, appearing to read 'Chuck Powers', with a long horizontal line extending to the right.

Chuck Powers
Director, Engineering and Technology Policy
Motorola Solutions, Inc.