

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Implementing Public Safety Broadband Provisions of the Middle Class Tax Relief and Job Creation Act of 2012)	PS Docket No. 12-94
)	
Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band)	PS Docket No. 06-229
)	
Service Rules for the 698-746, 747-762 and 777-792 MHz Bands)	WT Docket No. 06-150
)	

REPLY COMMENTS OF NOKIA SIEMENS NETWORKS

Nokia Siemens Networks US LLC (“Nokia Siemens Networks”) submits these brief reply comments in support of the Commission’s efforts through the *Notice of Proposed Rulemaking* (NPRM) in the above-referenced proceeding¹ to move forward with its licensing and related statutory responsibilities for the build out and operation of a nationwide public safety broadband network (NPSBN).

Nokia Siemens Networks has long supported the objective of bringing the benefits of commercial mobile broadband technology, in particular Long Term Evolution (“LTE”), to the

¹ PS Docket Nos. 12-94, PS Docket No. 06-229, WT Docket No. 06-150 (rel. Mar. 8, 2013) (“NPRM”).

public safety and first responder community. Passage of the Middle Class Tax Relief and Job Creation Act of 2012 (“the Spectrum Act”)² has provided the nation with a great opportunity to achieve this with the inclusion of provisions that allocated additional dedicated spectrum (the “D Block”) for public safety broadband use and provided the significant funding mechanism of future commercial auction revenue.

Nokia Siemens Networks is the mobile broadband specialist, leading the world in LTE network references. In addition to building commercial LTE networks in the U.S. with its operator customers, Nokia Siemens Networks is involved in a range of multi-vendor LTE pilot projects that are demonstrating the powerful services and applications that LTE can enable for the public safety community. Nokia Siemens Networks was the first of the global radio access network (RAN) vendors to make available an eNodeB for the full public safety spectrum block (3GPP Band Class 14) and the first to pass Phase 3 testing with NIST’s Public Safety Communications Research (PSCR) program.

Nokia Siemens Networks played an active role on the Commission’s Emergency Response Interoperability Center’s Public Safety Advisory Committee (PSAC), as a working group co-chair and report co-author. After passage of the Spectrum Act, Nokia Siemens Networks subsequently provided input to the Technical Advisory Board for First Responder Interoperability (“Interoperability Board”). The Spectrum Act directed that the minimum technical guidelines that the TAB transmitted to FirstNet are to serve as a baseline for the subsequent work of FirstNet in determining the overall network architecture and operating parameters of the NPSBN. Nokia Siemens Networks believes that the importance of the

² Middle Class Tax Relief and Job Creation Act of 2012, Pub. L. No. 112-96, 126 Stat. 156 (2012) (“Act”).

minimum technical guidelines should endure and that the Commission with its subject matter expertise and licensing responsibility should have a continuing role as the network rolls out and becomes operational. While Commission involvement has been instrumental in these early days of trials and pilots, this very well may remain the case into the future, for example in terms of assessing demonstrations of interoperability.

The Commission's role under the Spectrum Act of licensing the spectrum to FirstNet is an important one. The agency's longstanding technical and spectrum management expertise make this a duty that it is well prepared to undertake. Many of the service rules can be relatively easily established by consolidating the service rules into Part 90 as initial commenters generally agreed³ and by essentially aligning the technical rules for the NPSBN with those for commercial networks. The Commission can also further cement the accepted and statutorily-based framework of reliance on commercial standards that will allow the NPSBN to benefit from the global LTE ecosystem.⁴ On the other hand, there likely may be some decisions that the Commission might wait to make until it and interested stakeholders are able to assess further detailed information from FirstNet on its network architecture model and deployment plans.⁵

Nokia Siemens Networks also supports calls for the Commission to move forward as expeditiously as possible to resume granting new equipment authorizations for equipment for use in this spectrum.

³ See, e.g., Comments of APCO; Comments of Harris Corporation; Comments of AT&T Services, Inc.; Comments of Alcatel-Lucent; Comments of Ericsson.

⁴ See, e.g., comments of AT&T Services, Inc. at 2-3.

⁵ See Comments of Alcatel-Lucent at 3.

Nokia Siemens Networks looks forward to continuing to work with the Commission in support of the rollout of an LTE-based NPSBN. The Spectrum Act acknowledges the Commission's licensing, technical and spectrum expertise as an integral component of this important national imperative.

Respectfully submitted,

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