



11 July 2013

*VIA ELECTRONIC FILING*

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

**Re: Notice of Oral *Ex Parte* Presentation, PS Docket No. 13-87, WT Docket No. 96-86, RM-11433, PS Docket No. 06-229, RM-11577.**

Dear Ms. Dortch:

On July 9, 2013, Bob Plaschke, CEO of Sonim Technologies (“Sonim”), and Michael McMenamin met with David Turetsky and Gene Fullano of the Public Safety and Homeland Security Bureau and Walter Johnston and Rashmi Doshi of the Office of Engineering and Technology (“OET”) of the Federal Communications Commission (“FCC/Commission”). Initially, Bob Plaschke introduced Sonim Technologies and then discussed the Commission’s direction to the OET to suspend its acceptance testing and processing of any new equipment authorizations in the public safety 700 MHz Band 14 spectrum.

Sonim is an American based device manufacturer that makes the world’s most rugged, water-submersible mobile phone that is designed specifically for workers in demanding and hazardous environments and is available in over 50 countries, including the United States. Sonim has partnered with industry leading application developers to provide a suite of high-performance workforce-critical applications such as push-to-talk, lone worker/man-down safety services, mobile resource management and time and activity verification.

We seek to leverage our position as the 3G ruggedized device market leaders to build a ruggedized outdoor user based 4G Android Smartphone in 2014. The phones will be available directly from Sonim or via major carrier networks. In addition, Sonim intends to build a 4G device for public safety that will conform to all applicable 3GPP, FCC, and First Net requirements. Moreover, we are currently preparing a ruggedized device for National Institute of Standards and Technology Public Safety Communications Research testing.

Sonim is concerned with the Commission’s suspension of acceptance testing and equipment authorization for the 700 MHz public safety Band 14. In addition, Sonim discussed the broad support in the docket for advanced authorizations for devices for those jurisdictions that will build-out their networks before the national public safety



broadband network. In the coming months, Sonim believes that there will be an addressable public safety market that will seek devices for their networks.

Hence, we seek an interim solution pending adoption of such final technical rules that will allow for certainty for public safety and device manufacturers. We believe that this can be achieved by granting early build-outs authorizations under the previous provisions of the *Waiver Order*<sup>1</sup> where the Commission established technical requirements for equipment in the original 700 MHz public safety spectrum, 763-768/793-798 MHz bands, which can now be expanded in the interim to the rest of the public safety band, 758-763/788-793 MHz band.

In accordance with Section 1.1206(b)(2) of the Commission's rules, this letter is being filed electronically with your office. Please contact the undersigned with any questions in connection with this filing.

Respectfully submitted,

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Michael McMenamin

cc: David Turetsky  
Gene Fullano  
Walter Johnston  
Rashmi Doshi

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<sup>1</sup> See *Requests for Waiver of Various Petitioners to Allow the Establishment of 700 MHz Interoperable Public Safety Wireless Broadband Networks*, PS Docket 06-229, *Order*, 25 FCC 5145 (2010)(stating that equipment must meet 3GPP Release 8 or higher as a common technology platform).