

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Proposed Amendments to the Service Rules Governing Public Safety Narrowband Operations in the 769-775/799-805 MHz Bands	)	PS Docket No. 13-87
	)	
The Development of Operational, Technical and Spectrum Requirements for Meeting Federal, State and Local Public Safety Communications Requirements Through the Year 2010	)	WT Docket No. 96-86
	)	
National Public Safety Telecommunications Council Petition for Rulemaking on Aircraft Voice Operations at 700 MHz	)	RM-11433
	)	
National Public Safety Telecommunications Council Petition for Rulemaking to Revise 700 MHz Narrowband Channel Plan	)	RM-11433
	)	
Region 24 700 MHz Regional Planning Committee Petition for Rulemaking	)	WT Docket No. 96-86 PS Docket No. 06-229
	)	
State of Louisiana Petition for Rulemaking	)	RM-11577

**REPLY COMMENTS OF MOTOROLA SOLUTIONS, INC.**

Motorola Solutions, Inc. (“Motorola Solutions”) hereby submits these Reply Comments in the above-captioned proceeding.

Among other issues, this proceeding addresses the Commission’s existing rules that require manufacturers to cease marketing, manufacture, and import of 700 MHz narrowband equipment not capable of operating at 6.25 kHz efficiency by December 31, 2014.<sup>1</sup> The existing rules further require that public safety narrowband licensees must operate at 6.25 kHz voice

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<sup>1</sup> 47 C.F.R. § 90.203.

efficiency by December 31, 2016.<sup>2</sup> In the Notice, the Commission sought comment on whether it should extend or eliminate the schedule for its mandated transition to 6.25 kHz efficiency technology.<sup>3</sup>

In its initial comments, Motorola Solutions recommended that the Commission defer to the user community regarding the need for and timing of any transition to 6.25 kHz efficiency equipment.<sup>4</sup> While migrating to more efficient technology can promote efficient spectrum use, the Commission must first ensure that the needs of public safety licensees are addressed fully by any narrowband technology transition. This includes cost and interoperability considerations, as well as ensuring that there is sufficient equipment available to meet the operational demands of public safety users. Therefore, Motorola Solutions urged the Commission to give strong consideration to the recommendations of the user community when deciding whether and for how long to adjust the deadline for adoption of 6.25 kHz efficiency equipment. Motorola Solutions did recommend that the Commission extend by one year the manufacture/import transition deadline regardless of whether it decides to extend the 2016 transition deadline or not. Motorola Solutions noted that this would allow public safety agencies more time to assess their near-term needs, leverage existing equipment investment, and arrange funding for additional purchases, if necessary.<sup>5</sup>

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<sup>2</sup> 47 C.F.R. § 90.535.

<sup>3</sup> Proposed Amendment to the Service Rules Governing Public Safety Narrowband Operations in the 769-775/799-805 MHz Bands, et al., PS Docket No. 13-87, *Notice of Proposed Rulemaking*, 28 FCC Rcd 4783 ¶¶ 86-91 (2013) (“Notice”).

<sup>4</sup> Comments of Motorola Solutions, Inc., PS Docket No. 13-87 at 3 (filed June 18, 2013).

<sup>5</sup> *Id.* at 4.

In its Reply Comments, the Commonwealth of Virginia (“Virginia”) identified several of the challenges that are motivating calls for an extension of the timeline for transition to 6.25 kHz efficiency equipment.<sup>6</sup> As Virginia explains, despite the Project 25 Phase 2 specification work being complete for most digital trunked systems, budgetary and equipment availability problems remain that would complicate a rapid, mandatory migration to 6.25 kHz efficiency for all 700 MHz narrowband equipment. In particular, Virginia asserts that there is no P25 Phase 2 equipment to address user needs for vehicular repeaters, direct subscriber-to-subscriber TDMA, or 6.25 kHz FDMA non-trunked communications.<sup>7</sup> To address these challenges, Virginia asks the Commission to (i) eliminate or substantially extend the 6.25 kHz narrowbanding deadlines, (ii) exclude conventional operation equipment from this deadline, or (iii) exempt digital vehicular repeater system equipment entirely.<sup>8</sup>

Motorola Solutions agrees with the points raised by Virginia. As Motorola Solutions observed in its initial comments, there are public interest benefits to be realized from ensuring the availability of 6.25 kHz efficiency equipment for those public safety licensees who need the additional capacity.<sup>9</sup> The availability of the greater efficiency equipment in dual-mode devices (*e.g.*, 12.5 kHz & 6.25 kHz capable) would allow public safety agencies to address capacity challenges as they arise, and would allow equipment prices to decrease naturally over time. However, not all equipment – including the thousands of vehicular repeaters deployed in Virginia, Ohio, Illinois, and elsewhere – will be able to offer such operational flexibility for the foreseeable future. Therefore, even if the Commission chooses to maintain one or both of its

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<sup>6</sup> See Reply Comments of the Commonwealth of Virginia, PS Docket No. 13-87 (filed July 11, 2013) (“Virginia Reply Comments”).

<sup>7</sup> Virginia Reply Comments at 4.

<sup>8</sup> *Id.* at 5.

<sup>9</sup> Motorola Solutions Comments at 3-4.

narrowbanding deadlines (with appropriate extensions as endorsed by Motorola Solutions and others), it should consider exempting some classes of equipment from the transition altogether. Accordingly, Motorola Solutions supports Virginia's call for a narrowbanding exemption for non-trunked/conventional voice operations and digital vehicular repeater systems.

Respectfully submitted,

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