



1300 I Street, N.W., Suite 400 West
Washington, DC 20005

Donald C. Brittingham
Vice President – Public Safety Policy

VIA ECFS

September 4, 2013

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *Implementing Public Safety Broadband Provisions of the Middle Class
Tax Relief and Job Creation Act of 2012*, PS Docket No. 12-94

Dear Ms. Dortch:

On August 19, 2013, the Public Safety and Homeland Security Bureau released a Public Notice seeking comment on matters raised by the First Responder Network Authority (“FirstNet”) in its August 2, 2013 filing in the above captioned proceeding.¹ For the reasons described below, Verizon supports FirstNet’s recommendations.

First, as proposed by the Commission, FirstNet supports consolidating the technical rules for all spectrum licensed to FirstNet (758-769/788-799 MHz) under Part 90 of the Commission’s rules. This includes the 700 MHz “D Block” which is currently subject to the rules governing commercial use of spectrum under Part 27. Verizon agrees. As Verizon noted in its earlier submission, the establishment of a single uniform set of technical rules governing FirstNet’s use of its licensed spectrum will enable it to most effectively implement its statutory mandate to build, deploy, and operate the nationwide public safety broadband network.² While FirstNet’s spectrum should be governed by Part 90, the establishment of technical rules that are aligned with the rules applicable to commercial 700 MHz spectrum licensed under Part 27 will promote the development of a public safety broadband network that is interoperable and compatible with commercial networks, as envisioned by Congress.

¹ See *FCC Provides Opportunity for Comment on First Responder Network Authority Filing in PS Docket 12-94*, Public Notice DA 13-1775 (PSHSB rel. Aug. 19, 2013).

² See Reply Comments of Verizon and Verizon Wireless, PS Docket 12-94, filed Jun. 10, 2013 at 1-2.

There is broad support for FirstNet's recommendation from both public safety and industry commenters.³

Second, FirstNet supports "swift Commission actions to begin accepting and processing equipment authorizations in the newly combined spectrum."⁴ Verizon agrees. The development of both network and mobile LTE-based equipment that incorporates FirstNet's spectrum (Band 14) is critical to the long term success of the nationwide public safety broadband network. The Commission's earlier decision to freeze further equipment certifications, if not resolved promptly, could delay deployment of the network.

Importantly, early deployments of FirstNet's network are already beginning as it successfully concludes negotiations with jurisdictions previously awarded federal grants to build state- or region-based public safety networks. These early deployment networks could provide important information that will help guide FirstNet's deployment efforts, while also delivering critical broadband communications capabilities to first responders in those early adopter jurisdictions.

A lifting of the freeze will also promote the continued development of commercial LTE devices that incorporate Band 14, as well as commercial spectrum bands. The prompt availability of such devices will enable first responders to immediately take advantage of LTE's benefits on commercial networks, with the ability to transition to FirstNet's network when it is deployed. There is broad support for FirstNet's proposal from equipment manufacturers and others.⁵ Verizon joins these parties in requesting that the Commission move quickly to restart the Band 14 equipment authorization process.

Sincerely,

/s/ Donald C. Brittingham
Donald C. Brittingham

cc: Gene Fullano
Brian Hurley

³ See, e.g., *id.*; APCO Comments at 3; AT&T Comments at 2-4; Alcatel-Lucent Comments at 1-2; Motorola Solutions Comments at 3-4; NPSTC Comments at 3; Telecommunications Industry Association (TIA) Comments at 3-4.

⁴ See Comments of the National Telecommunications and Information Administration on Behalf of the First Responder Network Authority (FirstNet), PS Docket No. 12-94, at 3 (Aug. 2, 2013).

⁵ See TIA Comments at 5; Motorola Solutions Comments at 10 (May 24, 2013); Ericsson Comments at 6; APCO Comments at 4; Nokia Siemens Networks Reply Comments at 3; and Oceus Networks Reply Comments at 4.