

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

COMMENTS OF FIBERTOWER

On August 2nd the First Responder Network Authority (FirstNet)¹ asked the Federal Communications Commission to amend its technical service rules to enable FirstNet to expedite the deployment of the nationwide public safety broadband network. In their response to the Commission’s Notice of Proposed Rulemaking (NPRM) on implementing Public Safety Broadband Provisions of the Middle Class Tax Relief and Job Creations Act, FirstNet “urged the Commission to expedite a process to certify equipment for the FirstNet spectrum license” stating that there is “an imminent need for authorized equipment to meet the need of jurisdictions that might deploy early.”²

FiberTower, a national scope developer of competitive fixed wireless backhaul solutions, supports FirstNet’s interest in an expedited process for equipment certification. In their comment FirstNet noted that “the equipment market will need to evolve once the architecture for the nationwide public safety network has been set.”³ FiberTower urges FirstNet and the Commission to: (1) establish a process of equipment certification that includes equipment used in fixed wireless backhaul, and (2) support a process for quickly bringing small cell backhaul deployments to the market.

¹ Notice of Proposed Rulemaking, PS Docket 12-94, PS Docket 06-229 and WT Docket No. 06-150, released March 8, 2013. Comments were due by May 24, 2013 and Reply Comments by June 10, 2013.

² Comments of FirstNet, PS Docket 12-94 at 3 (Aug. 2, 2013).

³ *Id.* at 4.

As FiberTower has previously noted on the record in the Commission's Superstorm Sandy Field Hearings⁴, first responder telecommunications systems that have invested in hardened fixed wireless backhaul infrastructure proved more resilient and reliable during Superstorm Sandy than those that had not. Backhaul networks connect mobile and wireline carrier traffic from buildings and towers back to switching centers. In any given area, many retail carriers rely on the same backhaul network. The telecommunications systems that relied on reinforced networks that met certain standards set after 9/11, not only stayed running after natural disasters but can be repaired and restored much faster if they were to go down.

This country needs emergency response networks that will not go down – regardless of severity of weather conditions. According to federal standards, the key is to make sure that public safety networks are physically diverse and that their core traffic runs on “independently powerable” infrastructure. Independently powerable backhaul systems do not fail when the electrical grids fail. They have battery systems that can be re charged by generators. Physically-diverse backhaul systems have fixed wireless connection on rooftops and towers that escape fiber cuts or flooding.

As such, it is critical to continue to expedite solutions for also bringing immediately deployable, hardened backhaul systems to the field to ensure that the proposed public safety networks are capable of functioning flawlessly, especially in difficult conditions that may be presented by extreme weather or man-made events. Fixed wireless will play a role due to its ability to provide broadband access to urban and rural locations that cannot be served by wireline due to technical or economic constraints. Additionally, fixed wireless backhaul can offer physically diverse and independently powerable capabilities.

Respectfully submitted,

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⁴ *Ex Parte* statements of FiberTower on the Federal Communication Commission Superstorm Sandy Field Hearings in New York City and Hoboken, New Jersey, *Reliability and Continuity of Communications Networks, Including Broadband Technologies*, PS Docket No. 11-60, February 5, 2013.