



20 September 2013

VIA ELECTRONIC FILING

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

Re: **PS Docket No. 12-94**

Dear Ms. Dortch:

On September 18, 2013, Robert Escalle and the undersigned representing Sonim Technologies (“Sonim”), met with David Turetsky and Gene Fullano of the Public Safety and Homeland Security Bureau and Rasoul Safavian of the Office of Engineering and Technology (“OET”) of the Federal Communications Commission (“FCC/Commission”). The purpose of the meeting was to discuss the Commission’s Public Notice requesting comment on the First Responder Network Authority’s (“FirstNet”) August 2, 2013 filing.¹

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 FirstNet requirements. Moreover, we are currently preparing a ruggedized device for National Institute of Standards and Technology Public Safety Communications Research testing.

As a public safety device manufacturer, Sonim has a vested interest in the Commission lifting the suspension of acceptance testing and equipment authorization for

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



the 700 MHz Band 14 spectrum. Hence, Sonim supports FirstNet's recommendations that it made in its August 2, 2013 filing.

Sonim agrees with the Commission and FirstNet that consolidation of the technical service rules for the 758-769/788-799 MHz bands to Part 90 of the Commission's rules should occur. We also concur with FirstNet that the Commission should act swiftly "to begin accepting and processing equipment authorizations in the newly combined spectrum (763-769/793-799 MHz and the former D Block."² As Sonim plans to build devices that will require acceptance testing and authorizations for an addressable public safety market in the coming months. Finally, we support the Commission's plans to expedite this proceeding that would allow for acceptance testing and equipment authorizations to begin again in the 700 MHz public safety spectrum.

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,

Michael McMenamin

cc: David Turetsky
Gene Fullano
Rasoul Safavian

² FirstNet comments at 3.