

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
Technology Transitions Policy Task Force Request For Comments on Potential Trials)	GN Docket No. 13-5
)	
AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition)	GN Docket No. 12-353
)	

COMMENTS OF HARRIS CORPORATION

Harris Corporation (Harris) respectfully submits these comments in response to AT&T’s Proposal for Wire Center Trials (the “AT&T Proposal”) for experiments at two wire centers involving the transition of TDM-based services to IP wireline and wireless based services.¹ Harris appreciates the sensitivity the Commission and AT&T have shown in regard to potential increased risks to public safety that could result if TDM-IP and wireless trials are undertaken without protection of the Federal Aviation Administration’s (FAA) air traffic control systems that are dependent upon TDM wireline services.

¹ See Letter from Christopher M. Heimann, General Attorney, AT&T Services, Inc., to Marlene H. Dortch, Secretary, Federal Communications Commission, GN Docket Nos. 13-5, 12-353 (filed Feb. 27, 2014) (AT&T Proposal for Wire Center Trials).

I. The AT&T Proposal Appears to Abide by the Commission’s Mandate That No Transition Trial May Impact FAA Operations.

As noted in earlier filings,² the FAA Telecommunications Infrastructure (FTI) Program, which is the primary means through which the FAA acquires the telecommunications services required for National Airspace System (NAS), relies heavily today upon TDM services. While efforts are being made through the FAA’s “NextGen” Programs to upgrade the NAS to communications interfaces based upon Internet Protocol (IP) standards, over 92% of FTI services continue to be TDM-based. As the Prime Systems Integrator for FTI, Harris has urged that IP Transition trials are limited so that there are no negative cost or operational impacts upon FAA operations.³

In its Order laying out ground rules for IP Transition Trials, the Commission recognized potential impact to FAA of such trials and required that FAA operations not be harmed:

... [T]he Federal Aviation Administration..., maintain[s] communications systems that today rely heavily on legacy TDM-based networks and services.... As such, experiments must allow for the continuation of legacy TDM-based networks and services for such critical governmental systems until it is proven that other solutions can meet system requirements for the performance of safety of life and national security missions. Thus, in evaluating proposals we must be able to confirm that there will be no disruption to national security, emergency preparedness, and public safety operations that today depend on existing TDM-based communications services.⁴

² See, e.g., Harris Comments, AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition (filed Nov. 7, 2012) (AT&T Petition), GN Docket No. 12-353 (filed Jan. 25, 2013) (Harris Comments on AT&T Petition).

³ In an effort to continue to assess how FTI can further utilize IP technology in the future, it is working with a carrier to develop an IP Transition testing proposal to evaluate IP conversion opportunities. We look forward to collaborating with a carrier on this effort and to briefing the Commission of our findings.

⁴ See Technology Transitions, et al., GN Docket No. 13-5 et al., Order, Report and Order and Further Notice of Proposed Rulemaking, Report and Order, Order and Further Notice of Proposed Rulemaking, Proposal for Ongoing Data Initiative at ¶ 42, FCC 14-5 (rel. Jan. 31, 2014) (Technology Transitions Order).

In accordance with this requirement, AT&T has proposed a plan for conducting TDM to all-IP trials in two wire centers: 1) A rural wire center in Carbon Hill, AL; and 2) A suburban wire center in Kings Point, Palm Beach County, FL.⁵ In its plan, AT&T recognized the Commission's limitation of trials that impact FAA operations and states that, "there are no DOD facilities or facilities of any other Federal executive branch agency, including the FAA, served by any legacy TDM-based network facilities or services originating from the Trial Wire Centers."⁶

Harris has evaluated its listings of Wire Centers that are used to support FAA operations, and, based upon to its current knowledge agrees that no FTI traffic terminates at the Carbon Hill and King's Point wire centers. Harris continues to monitor these centers, and will raise any future revelations to the contrary with AT&T and the Commission. Based upon its current findings, Harris does not oppose AT&T's proposal with respect to impact upon FAA operations.

II. CONCLUSION

Given the fact that the FAA currently has a 92% reliance rate upon wireline TDM services provided by commercial telecommunications providers at wire centers across the nation, Harris lauds the Commission for placing restriction upon carriers proposing IP Transition Trials to ensure no harm to FAA operations. Moreover, Harris appreciates AT&T's effort to ensure that FAA operations are not implicated in its current trial proposal. Harris' evaluation confirms, at this time, AT&T's assertion that its proposal will not impact FAA operations. To that end,

⁵ See AT&T Proposal for Wire Center Trials, Wire Center Trial Operating Plan at 2.

⁶ *Id.*

Harris is currently supportive of AT&T's proposal, and will continue to work with AT&T and the Commission to ensure that FAA operations are not impacted by IP Transition trials. Should the Commission grant the AT&T proposal, Harris looks forward to evaluating the performance of IP wireline and wireless replacement services as compared to the performance of existing wireline services at the two wire centers; this data will assist in determining applicability to FAA operations currently dependent on TDM.

Respectfully submitted,

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