

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Amendment of Part 90 of the)	WT Docket No. 11-69
Commission's Rules to Permit)	
Terrestrial Trunked Radio (TETRA))	
Technology)	
)	
Request by the TETRA Association for)	ET Docket No. 09-234
Waiver of Sections 90.209, 90.210 and)	
2.1043 of the Commission's Rules)	

To: The Commission

**REPLY COMMENTS OF THE
TELECOMMUNICATIONS INDUSTRY ASSOCIATION**

I. INTRODUCTION AND SUMMARY

The Telecommunications Industry Association (TIA) hereby submits reply comments to the Federal Communications Commission (Commission) in the above captioned proceeding.¹ TIA and its members appreciate the opportunity to provide unique stakeholder comment on the issues raised by the TETRA NPRM. As detailed below, TIA believes that (1) the record supports industry recommendations that further study on the use of TETRA technology is needed, and that (2) the best venue for this process to occur is within the voluntary, consensus-based standards development system.

¹ In the matter of Amendment of Part 90 of the Commission's Rules to Permit Terrestrial Trunked Radio (TETRA) Technology, Request by the TETRA Association for Waiver of Sections 90.209, 90.210 and 2.1043 of the Commission's Rules, *Notice of Proposed Rulemaking and Order*, ET Docket No. 09-234, WT Docket No. 11-69, FCC 11-63 (rel. Apr. 26, 2011) (TETRA NPRM).

TIA represents the global information and communications technology (ICT) industry through standards development, advocacy, tradeshows, business opportunities, market intelligence and world-wide environmental regulatory analysis. For over eighty years, TIA has enhanced the business environments for broadband, mobile wireless, information technology, networks, cable, satellite, and unified communications. TIA's 600 member companies' products and services empower communications in every industry and market, including healthcare, education, security, public safety, transportation, government, the military, the environment, and entertainment. TIA is accredited by the American National Standards Institute (ANSI). A number of TIA members produce public safety narrow band devices and are involved in Project 25, the initiative that continues to develop standards for narrowband operability.

II. THE RECORD SUPPORTS THE NEED FOR FURTHER STUDY ON TETRA TECHNOLOGY'S EFFECT ON PUBLIC SAFETY USES

TIA concurs with the record which encourages the Commission to revisit its conclusion in "that TETRA technology provides sufficient interference protection to other technologies."² The public safety and manufacturer communities have both demonstrated for the Commission that, at minimum, there is apparent disagreement over whether TETRA technology will interfere with incumbent uses, and well as coordination and interoperability issues relating to P25 uses.³ Some of the comments that bolster TIA's

² TETRA NPRM at ¶ 9.

³ See Comments of Association of Public-Safety Communications Officials (APCO), WT Docket No. 11-69, ET Docket No. 09-234 (filed June 27, 2011) at 2 (APCO Comments); Comments of EF Johnson, Inc., WT Docket No. 11-69, ET Docket No. 09-234 (filed June 27, 2011) at 2 (EF Johnson Comments); Comments of Harris Corporation, WT Docket No. 11-69, ET Docket No. 09-234 (filed June 27, 2011) at 1, 4 (Harris Comments); Comments of Motorola Solutions, WT Docket No. 11-69, ET Docket No. 09-234 (filed June 27, 2011) at 4 (Motorola Solutions Comments), 11, 16; Comments of the National Public Safety Telecommunications Council (NPSTC), WT Docket No. 11-69, ET Docket No. 09-234 (filed June 27, 2011) at 6 (NPSTC Comments); Comments of P25 Technology Interest Group, WT Docket No. 11-69, ET Docket No. 09-234 (filed June 27, 2011) at 2, 5 (P25 Group Comments); Comments of TIA, WT Docket No. 11-69, ET Docket No. 09-234 (filed June 27, 2011) at 3 (TIA Comments).

argument for further study have been submitted from the TETRA technology manufacturer perspective, which, TIA believes, lends to their legitimacy as well as illustrates to the Commission that interference concerns expressed are technology-neutral in nature. A number of commenters also describe the issues raised by the TETRA NPRM's proposals in regards to coordination and interoperability.⁴

In light of the demonstrated interference and interoperability concerns, the use of TETRA technology should not be permitted in public safety pools, particularly within ESMR public safety frequencies until further study is completed. In our comments, TIA suggested that these concerns can best be addressed by refraining from allowing the proposed TETRA technology uses in the TETRA NPRM at this time, and deferring to the voluntary, consensus-based standard development process.

III. TETRA TECHNOLOGY SHOULD BE INTEGRATED VIA STANDARDIZATION ACROSS THE COUNTRY BEFORE USE IS ALLOWED IN PUBLIC SAFETY CHANNELS

Due to the significant concerns expressed by numerous commenters regarding potential risks to public safety communications, TIA reiterates that the most efficient way for the Commission to integrate TETRA technology into current LMR uses is to encourage TETRA technology integration via the voluntary and consensus-based standard development system.⁵ As TIA noted in its comment, TR-8 makes extensive use of participation input by public safety users of the technology, and invites any TETRA equipment manufacturers to collaborate in interoperability standard development.⁶ This would be the ideal environment for TETRA technology's integration into current LMR uses. The Project 25 process

⁴ See, e.g., Motorola Solutions Comments at 14-17, Harris Comments at 6-7, APCO Comments at 3, EF Johnson Comments at 2-3, P25 Group Comments at 5-6.

⁵ See TIA Comments at 5.

⁶ *Id.* at 5-8.

has enhanced competitiveness in the public safety narrowband market by promoting openness and innovation, leading to a significant increase in the number of vendors in every area of interoperable narrowband communications. In addition, Project 25 standards are available to any interested manufacturer on reasonable terms. Given this success, TIA strongly urges the Commission to allow the existing standard development system that TIA has in place to address the use of TETRA technology. The standardization process will include detailed study of interference and interoperability, addressing many of the current concerns regarding TETRA technology's potential deployment.

As TIA has previously noted for the Commission, the special technical and form factor needs of public safety are the principle drivers of narrowband device cost.⁷ Allowance of TETRA use in public safety pools, in our view, also risks the waste of resources due to required efforts to account for new interference. Drawing upon the experiences in the 800 MHz rebanding effort, the NPSTC noted that resolving interference after the fact is extremely time-consuming and costly to address.⁸ Some of the proposed solutions to facilitate the use of TETRA technology in public safety bands could also increase device cost: for example, in its comment, the TETRA Association concedes that it is not "economical" to have public safety users purchase multimode handsets at this time, though notes it as a likely technical solution to address interoperability.⁹ Based on this risk, TIA believes that its position on the allowance of TETRA technology in public safety channels is reinforced by the record. Future developments in cognitive radios, unimpeded by directives that raise significant interference and interoperability concerns, can most efficiently be attained through competition and voluntary standardization.

⁷ Comments of TIA, PS Docket No. 10-168 (filed Sept. 20, 2010) at 9-10 ("Public safety networks and equipment require unique attributes; stringent requirements both in performance and form factor add to the manufacturing cost of narrowband public safety equipment. An example can be seen in radio terminal handsets for firefighters. Firefighter handsets require a large form factor and hardened devices that can be operated while wearing large gloves in high heat environments. Additionally, public safety narrowband device requirements for durability and longevity of service are for long periods of time with actual service potentially reaching 10-15 years. These robust features and extreme operational demands impact product pricing.").

⁸ NPSTC Comments at 6.

⁹ Comments of the TETRA Association, WT Docket No. 11-69, ET Docket No. 09-234 (filed June 27, 2011) at 6.

IV. CONCLUSION

TIA recommends that the Commission forgo adopting further new regulations related to TETRA use at this time. Consistent with the record, the Commission should encourage the standardization of TETRA channeling across the U.S. within the existing voluntary and consensus-based standard development process.

Respectfully submitted,

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

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