



March 3, 2016

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

Re: Notice of *Ex Parte* Communication, PS Docket No. 13-87; PS Docket No. 06-229, WT Docket No. 96-86, RM-11433, RM-111577 Service Rules Governing Narrowband Operations in the 769-775/799-805 MHz Bands (“Report and Order”) and the TIA Petition for Reconsideration, PS Docket 13-87

Dear Ms. Dortch:

On March 2, 2016 Mark Uncapher, Director of Regulatory and Government Affairs for Telecommunications Industry Association (“TIA”),¹ and Andy Davis, Senior Resource Manager for Motorola Solutions held an ex parte telephone conference call with Michael J. Wilhelm, David Furth, John A. Evanoff, and Renee Roland of the FCC’s PSHSB and Bruce Romano of the OET.

Mr. Davis serves as Chairman of TIA’s TR-8 Engineering Committee. This committee formulates and maintains standards for private radio communications systems and equipment for both voice and data applications. TR-8 addresses all technical matters for systems and services, including definitions, interoperability, compatibility and compliance requirements. The types of systems addressed by these standards include business and industrial dispatch applications, as well as public safety (such as police, ambulance and firefighting) applications.²

The call addressed the Conformity Assessment Program certification language in the 700 MHz Public Safety Narrowbanding Report and Order. The TIA participants renewed the concern contained in their petition for reconsideration about requiring CAP certification at the time of

¹ TIA is a Washington, DC-based trade association and American National Standards Institute (ANSI)-accredited standard developer that represent the global information and communications technology (“ICT”) manufacturer, vendor, and supplier community. TIA represents approximately 500 participating companies producing products and services empowering communications in every industry and market, including healthcare, education, security, public safety, transportation, government, and the military, the environment, and entertainment. See <http://tiaonline.org/>.

² Much of the work of the TR-8 Committee relates to the formulation of TIA-102 Series standards for APCO Project 25. These are standards sponsored by the Association of Public-Safety Officials International (APCO),, the National Association of State Telecommunications Directors (NASTD) and agencies of the federal government. Project 25 standards are developed to provide digital voice and data communications systems suited for public-safety and first-responder applications.

submission to the FCC for type approval. CAP certification depends on the availability of competing products for interoperability testing to be conducted. Consequently requiring CAP interoperability at the time of application could delay new product introduction.³

Mr. Davis also discussed the comments of the P25 Compliance Assessment Program Compliance Advisory Panel on January 30 2016, in which the group listed 15 functional items that they believe are important for equipment operating on the 700 MHz Conventional Interoperability channels.^{4 5}

However, Mr. Davis noted:

- Item # 3 (SUBSCRIBER UNIT AND ACCESSORY MIL-SPEC REQUIREMENTS (SOR 1.3.3 thru 1.3.3.5 Mandatory mil specs) is not covered by P25 standards.
- None of the 15 items are currently within the scope of the CAP CAI CAB, with the possible exception of item # 10 (C4FM and CQPSK modulation),
- Regarding item # 10, the current CAP CAI CAB allows, but does not specify, testing with either or both modulation types.
- Regarding item # 3 (mil specs), item # 9 (SU Busy bits) and item # 14 (Station outbound status symbol operation), this functionality is not within the scope of the draft CAP CAI CAB.

³ See Petition for Reconsideration by the Telecommunications Industry Association, PS Docket 13-87, January 2, 2015

⁴ see Comments of P25 Compliance Assessment Program Advisory Panel (P25 CAP AP) PS Docket 13-87, WT Docket No. 96-86, PS Docket No. 06-229 RM-11433, RM-11577, (January 30, 2016)

⁵ The P25 Compliance Assessment Program Advisory Panel (P25 CAP AP) is an advisory panel formed by the Office of Interoperability and Compatibility (OIC) within the Science and Technology Directorate of the US Department of Homeland Security to help establish standards among digital two way land mobile radio communications products. The P25 CAP AP oversees the P25 CAP program and makes recommendations to OIC to promote the P25 standard in communications equipment within the public safety community

Pursuant to Section 1.1206 of the Commission's rules,⁶ this letter is being electronically filed via ECFS and a copy of this submission is being provided electronically to the meeting attendees.

Respectfully submitted,

TELECOMMUNICATIONS INDUSTRY ASSOCIATION

By: /s/ Mark Uncapher

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⁶ See 47 C.F.R. § 1.1206.