



November 23, 2015

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-11577 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 November 19, 2015, Mark Uncapher, Director of Regulatory and Government Affairs, Telecommunications Industry Association (“TIA”),¹ and Chuck Powers, Motorola Solutions met with Michael J. Wilhelm and John A. Evanoff, Federal Communications Commission’s (“FCC”) Public Safety and Homeland Security Bureau, and Rashmi Doshi, FCC Office of Engineering Technology. Participating via telephone were Roy McClellan, Airbus DS Communications; Dennis Martinez and Derek Wells, Harris Communications; Chris Lougee, ICOM America; Andy Davis and David Eierman, Motorola Solutions. Also on the call were Ralph A. Haller, Stuart Overby Tom Sorley and Marilyn Ward, National Public Safety Telecommunications Council (“NPSTC”).

The meeting addressed the Compliance Assessment Program (“CAP”) certification language in the 700 MHz Public Safety Narrowbanding Report and Order. The company participants renewed the concern contained in TIA’s petition for reconsideration about requiring CAP certification at the time of 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.²

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

- Discussion focused on more specifically clarifying the required interoperability functionality. General agreement proposed using a subset of P25, specifically conventional FDMA Air Interface features for use on the 700 MHz Interoperability channels.
- Another suggestion was that a list of specific P25 Conventional FDMA Air Interface features to be required might come from the CAP Advisory Panel. However, some concern was expressed about whether the Advisory Panel would provide this guidance to the FCC in a timely manner.
- There was general agreement that requiring interoperability test results at the time of type acceptance is not practical and a preferred point in time would be when the product is marketed and/or sold and/or delivered and/or put in to use.
- Some discussion addressed the imprecision of the terms “marketed” and “sold”. Using a requirement for interoperability test results prior to “delivery” might be best.
- There was general agreement that the rules being considered would be added to part 90 adjacent to existing rules associated with P25.
- There was general agreement that while CAP interoperability test results are preferred, there may be extenuating circumstances where a manufacturer may only be able to provide interoperability test results that are not available on the CAP website.

Pursuant to Section 1.1206 of the Commission’s rules,³ this letter is being electronically filed via ECFS and a copy of this submission is being provided electronically to the meeting attendees.

Respectfully submitted,

/s/ Mark Uncapher

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Chris Lougee, Icom America

³ See 47 C.F.R. § 1.1206.