



**TELECOMMUNICATIONS  
INDUSTRY ASSOCIATION**

**HEADQUARTERS**

2500 Wilson Boulevard  
Suite 300  
Arlington, VA 22201-3834  
+1.703.907.7700

**D.C. OFFICE**

10 G Street, N.E., Suite  
550 Washington, DC 20002  
+1.202.346.3240 MAIN  
+1.202.346.3241 FAX

[tiaonline.org](http://tiaonline.org)

**By Electronic Delivery**

April 19, 2012

Attn: Honorable Larry Strickling  
Administrator  
National Telecommunications & Information Administration  
1401 Constitution Avenue, NW  
Washington, DC 20230

**Re: *The National Telecommunications & Information  
Administration First Responder Network Authority's Deployment and  
Administration of the Future Public Safety Broadband Network***

Dear Mr. Strickling:

The Telecommunications Industry Association (“TIA”) writes to express its support of the National Telecommunications & Information Administration’s (“NTIA”) and the First Responder Network Authority’s (“FirstNet”) efforts to realize the public safety broadband network as envisioned by Congress.<sup>1</sup> Further, TIA urges that expertise of TIA’s members be leveraged through early input into the development of FirstNet and direct eligibility for FirstNet buildout funds. TIA’s hundreds of member companies provide, develop, manufacture, and supply information and communications technology (ICT) products and services, including all components of the planned national public safety broadband network. A robust, FirstNet network, built utilizing a competitive vendor ecosystem that encourages all qualified parties to engage in FirstNet’s request for proposal process, will provide emergency responders with new video and data applications that are not currently available and increase access for public safety entities across the country to these much-needed enhanced communications capabilities, resulting in the most effective use of resources and saved lives.

---

<sup>1</sup> See Middle Class Tax Relief and Job Creation Act of 2012, Pub. L. No. 112-96 (2012).

We believe that it is crucial for NTIA to make efforts to fully consider the wide range of interests affected by FirstNet in its decisions and processes, as it works to create FirstNet in the first instance. As recently noted by the Government Accountability Office, FirstNet faces a number of challenges, including:<sup>2</sup>

- ensuring interoperability;
- implementing an efficient and effective governance structure is employed by FirstNet;
- ensuring required voice capabilities, including “talk around” capabilities;
- building and designing a redundant, resilient, and reliable network; and
- determining adequate funding sources.

To ensure that NTIA considers these and other issues fully, we urge NTIA to commence a public proceeding that allows for comment as an early step in the establishment of the nationwide public safety broadband network and FirstNet. Public input from a broad range of stakeholders, including vendors with significant expertise in network technology and network deployment, commercial mobile and fixed operators of all sizes, systems integrators, and utilities who share mission-critical needs with public safety, etc., would help NTIA select Members of the FirstNet Board best prepared to meet FirstNet's statutory duty to craft a nationwide public safety broadband architecture based on commercial open-standards technology.

Industry stakeholders especially offer unique and necessary expertise to support the implementation of a nationwide network. Inclusion in NTIA's process as it works to create FirstNet will also aid NTIA in fully anticipating and addressing issues which might otherwise lead to state opt-outs from FirstNet. Moreover, we urge that FirstNet ensure that all entities, to include the broad range of stakeholders and not just the operators, can

---

<sup>2</sup> See GAO Report to Congressional Requesters – Emergency Communications: Various Challenges Likely to Slow Implementation of a Public Safety Broadband Network (2012), available at <http://www.gao.gov/assets/590/588795.pdf>

compete for FirstNet buildout funds to maximize resources, enhance innovation, and ensure interoperability.

We thank you for your thoughtful consideration as NTIA works to form FirstNet, which will deploy and operate the public safety broadband network, and look forward to your decisions in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Grant E. Seiffert". The signature is written in a cursive style with some loops and flourishes.

Grant Seiffert  
President  
Telecommunications Industry Association