

June 17, 2008

Via Electronic Filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, DC 20554

Re: *Service Rules for the 698-746, 747-762 and 777-792 MHz Bands*, WT Docket No. 06-150; *Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band*, PS Docket No. 06-229.

Dear Ms. Dortch:

The Telecommunications Industry Association (TIA) supports the Federal Communications Commission's (the Commission) intent to reauction the D Block spectrum to promote broadband deployment and facilitate an interoperable public safety network.¹ TIA has been a strong supporter of the Digital Television (DTV) Transition and the Congressional mandate to auction the resulting available commercial spectrum.² In particular, TIA has viewed the enablement of new interoperable public safety networks featuring broadband technologies and Land Mobile Radio Systems (LMRS) as a major benefit of the DTV transition. Accordingly, TIA urges the Commission to commit to an auction of the D Block spectrum as quickly as feasible to ensure the DTV transition of February 17, 2009.

Currently in its 84th year, the TIA represents the global information and communications technology (ICT) industry through standards development, advocacy, business opportunities, market intelligence and world-wide environmental regulatory compliance. Thousands of companies and individuals work through TIA to enhance the business environment for telecommunications, broadband, mobile wireless, information

¹ See *Service Rules for the 698-746, 747-762 and 777-792 MHz Bands*, WT Docket No. 06-150; *Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band*, PS Docket No. 06-229, *Second Further Notice of Proposed Rulemaking* ("Second Further Notice") ¶ 6 (rel. May 14, 2008) (detailing the policy goals of the Second Further Notice).

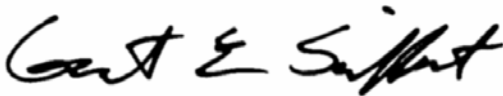
² See Deficit Reduction Act of 2005, Pub. L. No. 109-171, 120 Stat. 4 (2006) ("DRA"). Title III of the DRA is the DTV Act.

technology, networks, cable, satellite, unified communications, emergency communications and the greening of technology. TIA is accredited by the American National Standards Institute (ANSI).

TIA believes it is essential to ensure that when analog television broadcasting ceases, Americans can immediately begin to realize the promise of the spectrum that is available. TIA also strongly endorses the deployment of advanced, interoperable networks supporting converged communications services that offer public safety agencies state-of-the-art broadband voice, video, and data applications. TIA has served as the standards forum for the adoption of the first standards-based public safety radio systems. Additionally, TIA has worked to develop standards using both broadband and LMRS technologies for interoperable public safety systems. TIA has learned from its standards work and the technologies developed by its members that broadband and LMRS technologies are both necessary elements of interoperable public safety systems. Recognition of this fact by the Commission and public safety agencies has enhanced the opportunity to effectively develop an interoperable public safety network. While such a network will not be built out by February 17, 2009, it is important that the licensing issues be resolved and that the American public can see tangible progress toward the full utilization of public safety spectrum in the 700 MHz band.

TIA applauds the FCC's innovative thinking about how to ensure that an interoperable public safety network might be built in the absence of governmental funding to do so. What is most critical now is that a plan be adopted and implemented quickly to react to the D Block. TIA looks forward to further working with the Commission to expedite the reaction of the D Block and ensure that interoperable public safety networks using broadband and LMRS are swiftly deployed.

Sincerely,

A handwritten signature in black ink, appearing to read "Grant E. Seiffert". The signature is written in a cursive, flowing style.

Grant Seiffert
President