



Advancing Global Communications

April 20, 2007

The Honorable William Lacy Clay
Chairman
Subcommittee on Information Policy, Census, and National Archives
Committee on Oversight and Government Reform
U.S. House of Representatives

The Honorable Dennis J. Kucinich
Chairman
Subcommittee on Domestic Policy
Committee on Oversight and Government Reform
U.S. House of Representatives

Dear Chairman Clay and Chairman Kucinich:

The Telecommunications Industry Association (TIA) commends the efforts of the Government Accountability Office (GAO) to create its report entitled "FIRST RESPONDERS: Much Work Remains to Improve Communications Interoperability" (GAO-07-301). TIA takes its role in improving the technology that supports first responders very seriously and agrees with the GAO's conclusion that "a comprehensive suite of standards such as Project 25 is critical to achieving interoperability among different manufacturers' products."

However, TIA strongly disputes the GAO's finding that "the private sector coordinating body responsible for developing Project 25 standards...has made little progress." Moreover, TIA believes that the report contains a number of inaccurate statements. Since TIA was not consulted by the GAO prior to releasing the report, we would like to take this opportunity to highlight some of our most significant concerns with the report's conclusions.

Project 25 (P25) is an interoperability suite of standards for digital two-way wireless communications products and systems. The P25 standards are created by a committee of manufacturers, public safety agencies, and state and federal communications professionals to provide detailed standards for the design of communications systems so that all purchasers of P25-compatible equipment can communicate with each other. The P25 standards are published by TIA, an American National Standards Institute (ANSI)-accredited Standards Development Organization.

Since its inception, the P25 effort has led to the publication by TIA of 125 documents (including initial documents, addenda, and revisions) that support interoperability for public safety networks. These successes have been endorsed or supported by numerous

agencies including the Federal Communications Commission, the National Communications System, the Department of Defense, the Department of Homeland Security, the National Telecommunications and Information Administration, the Department of the Treasury, the Department of Interior, and the Department of Justice. Moreover, hundreds of P25 systems are operational in dozens of countries throughout the world.

The GAO report states that “vendors have developed incompatible, proprietary products rather than interoperable, standards-based products.” This sentence is extremely misleading. P25 standards are predicated on a comprehensive Statement of Requirements (SoR), which includes a list of mandatory requirements that every P25-compliant product provider *must* be able to provide. Therefore, every manufacturer *must* meet the mandatory requirements listed in the SoR to provide P25-compliant equipment. The SoR also includes a list of “Standard Options” that a manufacturer *may* choose to provide. Thus, if the standard’s option is provided to the user, it must also be implemented in accordance with the standard.

However, in some cases, a public safety user *may* request a proprietary value-added feature. While the user is permitted to select such a feature, the manufacturer is still required to provide the features that were specified in the SoR. Accordingly, the value-added feature may be incompatible, but public safety users choosing these value-added features will still have interoperable standards-based products. Thus, under all circumstances, despite the proprietary value-added feature, every P25 user will have the essential ability to communicate with every other P25 user, provided that the user’s P25-compliant radio has been authorized by its home infrastructure and is operating on its assigned spectrum.

The GAO report also states that “from 1993 through 2005, no additional standards were developed that could be used by a vendor to develop additional elements of Project 25-compliant systems.” This is a factually inaccurate statement. In fact, 114 standards and documents were published between 1993 and 2005 (see the attached table for details), which are all included in the P25 suite of standards.

Finally, the GAO report notes that “a lack of compliance testing has limited product interoperability.” However, the report fails to mention that since 2005, the P25 community has been working with the National Institute of Standards and Technology (NIST) to develop the guidelines for a compliance testing program. There have also been self-initiated tests conducted by manufacturers successfully demonstrating the interoperability of P25-compliant equipment, most recently in January 2007. Using General Dynamics test facilities, EADS Secure Networks was able to interconnect its P25 radio system network with a P25 radio system developed by M/A-COM.

TIA is committed to improving communications interoperability at all levels of government. While TIA understands the need for the GAO to conduct performance management reports, it is extremely concerned that this report misleads the Congress and others by not adequately evaluating and reporting the appropriate data.

TIA staff remains available to answer any questions and provide accurate information to ensure that interoperable public safety communications are available to America's first responders.

Sincerely,

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

Grant Seiffert
President

TIA 102 and 902 Series Documents Processed 1993 - 2007 (as of 4/15/2007)

