



D Block Spectrum Should be Reallocated to Public Safety

Harris Corporation ("Harris") supports the public safety community's request for legislative action to reallocate the 10 MHz of spectrum known as the D-Block for public safety use. Such a reallocation, combined with the 10 MHz of spectrum already allocated for public safety use, will create a contiguous, nationwide 20MHz swath of broadband spectrum for wireless public safety applications. With Congress' leadership and financial support Harris believes that the nation's goal for a 700MHz nationwide, interoperable broadband public safety network can be realized and our nation's first responders will be afforded the same state-of-the-art communications technology as the citizens they protect.

In 2008 the D-Block, in accordance with congressional mandate, was put up for commercial auction. In accordance with Federal Communications Commission ("FCC") rules the D-Block was to be paired with an adjacent block of broadband spectrum allocated to Public Safety to create a shared wireless broadband network that would be used by public safety users as well as commercial users. The winning bidder of the commercial license in the D-block would be obligated to enter into a public/private partnership with the nationwide licensee of the public safety broadband spectrum to enable construction of this interoperable broadband network. Unfortunately, the D-Block auction was a failure and did not produce a D-Block commercial licensee. Today, even following the completion of the digital television transition, both the D-Block and public safety broadband spectrum lay fallow.

Along with the public safety community, Harris has publicly stated its support of and made numerous recommendations addressing how to establish a nationwide, interoperable broadband public safety network in both comments filed with the FCC and through invited participation in FCC hearings. Although 10 MHz may be useful, Harris believes that a full 20 MHz of dedicated public safety broadband spectrum is necessary to fully accommodate the bandwidth intensive broadband applications required by public safety users and first responders.

The FCC envisioned the 700 MHz public safety broadband network as a wide-area, mobile broadband data solution.ⁱ While the 10 MHz of spectrum currently allocated to public safety will satisfy many public safety mobile broadband needs,ⁱⁱ this spectrum allocation may be insufficient to accommodate some of the envisioned uses for the network. For example, as outlined in the SAFECOM Statement of Requirements for Public Safety Wireless Communications and Interoperability, broadband networks are expected to carry surveillance video from fixed surveillance cameras throughout a city to public safety vehicles in the field.ⁱⁱⁱ Today, "the available 5 MHz of public safety uplink spectrum can accommodate only a limited number of cameras per cell before these fixed wireless video applications exhaust the spectrum" (typical IP surveillance video operates at 500 kbps–1.5 Mbps).^{iv}

A shared network concept (10MHz + 10MHz) governed through a national public/private partnership between commercial and public safety at first appeared to be the most logical path to fund a nationwide, interoperable broadband public safety network. However, the failure of the D-Block auction and resulting uncertainty surrounding the future of the shared wireless broadband network has prevented the deployment of critically needed public safety broadband systems. Nevertheless, in recent months the public safety community has started to take action on the local and regional level to develop and deploy public safety broadband systems. There are currently 16 outstanding waiver requests from local jurisdictions before the FCC requesting immediate access to the 700 MHz public safety broadband spectrum to deploy broadband systems. In addition, a handful of public safety entities are looking to the future by including broadband capabilities in their planning for new public safety communications systems.

Although Harris continues to support the creation of a nationwide, interoperable broadband public safety network, it is becoming increasingly clear that a regional, network of networks approach, will best serve to accelerate the general deployment of public safety broadband. The call for regional flexibility for the use



and deployment of public safety broadband systems has been endorsed by many public safety organizations including the Public Safety Spectrum Trust Corp ("PSST") and the National Public Safety Telecommunications Council ("NPSTC"). However, achieving the goal of a nationwide broadband interoperable network for public safety will be ultimately dependent upon funding available for all public safety entities, including those serving rural areas, to access spectrum, deploy technology and connect to the network.

Furthermore, Harris agrees with NPSTC's recommendations set forth in the Broadband Task Force Report ("BBTF") urging Congress and the FCC to "explicitly allow use of the national interoperable broadband wireless network in spectrum allocated to public safety by not only first responders, but also by emergency response support agencies (such as utilities, transportation, certain Federal government agencies, and general government)."^v Not only do these public service agencies provide critical emergency response during local, regional and national disasters, they represent the very real potential for public and private partners in rural areas to realize cost and coverage benefits through shared systems.

The nation's goal for wide scale use of broadband and national communications interoperability rests in the wise use of spectrum and the creation of a 700 MHz nationwide interoperable wireless broadband public safety network. Congress has the ability, and the responsibility, to take the action to assign the D-Block to our nation's first responders so that they can better serve the citizens they protect.

About Harris Corporation

Harris is an international communications and information technology company serving government and commercial markets in more than 150 countries. Headquartered in Melbourne, Florida, the company has approximately \$5 billion of annual revenue and more than 15,000 employees — including nearly 7,000 engineers and scientists. Harris is dedicated to developing best-in-class *assured communications*[®] products, systems, and services. Additional information about Harris Corporation is available at www.harris.com.

ⁱ See Service Rules for the 698-746, 747-762 and 777-792 MHz Bands; Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band, *Second Further Notice of Proposed Rulemaking*, WT Docket No. 06-150 and PS Docket No. 06-229, 23 FCC Rcd 8047, 8070-8071, ¶ 59 (2008) (mandating "[s]pecifications for a broadband technology platform that provides *mobile* voice, video, and data capability that is seamlessly interoperable across agencies, jurisdictions, and geographic areas") (emphasis added).

ⁱⁱ See Service Rules for the 698-746, 747-762 and 777-792 MHz Bands; Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band, *Third Further Notice of Proposed Rulemaking*, WT Docket No. 06-150 and PS Docket No. 06-229 FCC Rcd. 14301, 14333-14334, ¶¶ 86-87 (2008).

ⁱⁱⁱ See The SAFECOM Program, Department of Homeland Security, *Statement of Requirements for Public Safety Wireless Communications & Interoperability*, p. 48 (2004) (explaining that an incident commander should be able to "access video from private, non-public safety sources, such as schools, banks, area surveillance cameras, news cameras, traffic cameras").

^{iv} Public Safety Interoperable Communications—The 700 MHz Proceeding, Before the Federal Communications Commission, p. 6 (2008) (statement of Richard Taylor, Senior Technologist, Tyco Electronics M/A-COM).

^v National Public Safety Telecommunications Council, *700 MHz Public Safety Broadband Task Force Report and Recommendations*, Appendix G, p. 83 (2009).