

Before the
Federal Communications Commission
Washington, DC 20554

Public Hearing on Public Safety Interoperable Communications and the
700 MHz D Block Proceeding

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TESTIMONY

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Mr. Chairman and Distinguished Commissioners:

Thank you for the opportunity to appear here today to express Alcatel-Lucent's views regarding public safety interoperable communications and the 700 MHz D Block Proceeding. I am a Senior Director at Alcatel-Lucent with responsibility for public safety.

Alcatel-Lucent is proud to be a global leader in broadband access, and in carrier and enterprise IP technologies and services. With 77,000 employees and operations in more than 130 countries, we provide solutions that enable service providers, enterprises, and governments worldwide to deliver voice, data and video communication services to end users.

Alcatel-Lucent commends the Commission for its continuing commitment to the deployment of a nationwide, interoperable broadband public safety network in the 700 MHz band. We support the ongoing pursuit of a public/private partnership, and we urge the Commission to press forward to make this goal a reality.

At Alcatel-Lucent, we have first-hand experience with the benefits of interoperable broadband public safety communications that rely on commercial technologies. Alcatel-Lucent successfully constructed the first-ever 700 MHz interoperable public safety broadband network, the National Capital Region system in the Washington, DC area. The National Capital Region network, based on CDMA EVDO Rev. A technology, provides first responders across numerous agencies with broadband capabilities – including high speed data and video capabilities. Looking ahead, the network can be easily migrated from 3G speeds to 4G capabilities relying on LTE technology, for example.

The National Capital Region network has been a great success in Washington, DC, and first responders across the nation should be afforded the same benefits.

As the Commission revisits the rules for a 700 MHz public/private partnership, the challenges are substantial – but surmountable. We are all aware that despite the FCC’s laudable efforts last year, uncertainties proved too great to attract a winning bid on the D Block. For the public/private partnership to succeed, the Commission must revise its approach and determine basic network requirements for the shared network in a commercially reasonable manner. To do so, the FCC should adopt a baseline level of public safety applications and service capabilities that will be supported across the entire network – and these requirements should be commercially achievable in more remote areas and not just in urban markets. At the same time, where commercial demand drives enhanced network deployment, the Commission should require that public safety gain access to the same services and applications and coverage capabilities available to commercial users.

To further these objectives, Alcatel-Lucent supports the operational capabilities contained in the Public Safety Spectrum Trust’s BID Version 2.0 (Table 2.9.2-A) as the baseline service and application capability requirements for the public/private partnership. These

requirements are also generally consistent with the minimum service provisions established for the National Capital Region network. The shared network would as an initial matter be engineered to provide some video capabilities and high data rates outdoors and, in many areas, in-building email and instant messaging. Public safety's need for enhanced in-building voice communications can and should be addressed using current narrowband channels.

With this approach, the Commission can ensure rapid deployment of meaningful network capabilities, a commercially viable public/private partnership, and access to evolving commercial technologies. Many urban areas will, of course, immediately have greater capabilities given commercial demand.

Finally, the Commission should allow public safety agencies to construct and operate -network facilities ahead of the D Block licensee. Given the time needed to complete the current D Block proceeding, conduct an auction, select a winning bidder, and negotiate the Network Service Agreement, buildout of the shared network will not commence for some time. In the meantime, public safety broadband needs remain unmet.

Under these circumstances, the FCC should take steps to modify the 700 MHz rules and allow public safety entities to build out more rapidly. Provided a network meets the baseline requirements for the shared network, or can easily migrate to the technology, the Commission should provide that the regional network will be integrated into the nationwide shared network and the public safety licensees will be reasonably compensated for construction of the regional network.

In closing, Alcatel-Lucent thanks the Commission for its leadership and urges it to press forward to ensure public safety has access to interoperable broadband communications capabilities as quickly as possible.

Thank you for your time and consideration.