

July 13, 2009

Julius Knapp
Chief, Office of Engineering and Technology
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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Federal Communications Commission
Bureau / Office

RE: Experimental License Application of Tecore, Inc.
FCC File Number 0202-EX-PL-2009

Dear Mr. Knapp:

CTIA – The Wireless Association® (“CTIA”) respectfully submits this letter in support of the above-referenced experimental license application of Tecore Networks, Inc. (“Tecore”). CTIA supports the grant of this experimental license – on a fully coordinated basis with CTIA’s affected members – to better develop a record on the capabilities of alternative technological solutions to the unlawful use of mobile devices within prisons. The possession and use of wireless devices by inmates in correctional facilities is a genuine and important issue, and CTIA supports the development and real-world testing of lawful solutions to stop the unauthorized use of these devices by inmates. CTIA submits that the testing of Tecore’s proposed solution will enable interested stakeholders, including state and federal corrections agencies, other interested administrative agencies, the Public Safety community, and wireless carriers, to gather important data on the ability of non-jamming technologies to mitigate and resolve the illicit use of wireless phones within prisons.

CTIA recently hosted a day-long discussion among its members and several companies that have developed potential technologies for lawfully addressing the use of mobile devices within correctional facilities. Tecore was one of the presenters and indicated that its proposed solution would allow for the denial of access to the wireless network within a prison without the use of any jamming technology. To enable this capability, Tecore would deploy base station technology that would transmit a “preferred” signal covering the grounds of the prison and thereby locking any unauthorized communications traffic to its network’s control. Tecore’s demonstration of this capability, however, requires operating authority to transmit in the cellular (824-849/869-894 MHz) and Personal Communications Service (“PCS”) (1850-1910/1930-1990 MHz) bands, which Tecore seeks in its experimental license request.

CTIA believes there is merit to Tecore’s technological proposal and supports the grant of Tecore’s experimental license request. Because Tecore must transmit in the cellular and PCS frequency bands, CTIA asks that the Federal Communications

Commission (“Commission”) condition the experimental grant with a requirement to coordinate all operations with CTIA’s affected members that hold cellular and PCS licenses in the market area of the test. CTIA has discussed this effort with its members and there is agreement that such coordination is feasible and that the underlying experimental testing would be desirable.

CTIA expects that the proposed tests can gather significant data to help determine whether Tecore’s technology could effectively manage cell phone usage in the prison environment. This exercise will help the Commission, the Maryland Department of Public Safety and Corrections, and other affected parties gauge the effectiveness of this solution. CTIA believes that these cooperative efforts will assist in the development of well-considered solutions and aid in the creation of a full record of the capabilities of lawful technologies that can aid corrections officials’ efforts in combating cell phone usage within prisons.

Thank you for your prompt attention to this matter. Please do not hesitate to contact me or Brian Josef (202-736-3253, or bjosef@ctia.org) with any questions.

Sincerely,

Christopher Guttman-McCabe

Christopher Guttman-McCabe
Vice President, Regulatory Affairs

cc: Jim Schlichting
Ira Keltz
James Burtle
David Hu
Charles Mathias