

John Kennedy

From: Philip.Harris@L-3COM.COM
Sent: Monday, October 22, 2007 11:11 AM
To: John Kennedy
Subject: File Number 0471-EX-PL-2007

Mr. John Kennedy

Expedite Request: FCC Form 442 - File Number 0471-EX-PL-2007, Dated: 09/19/2007

John,

Thank you for taking the time to speak with me on the telephone this morning.

The Town of Orangetown, NY has agreed to apply for an experimental, FCC Part-5, authorization for use of multiband/SDR technology, for the purpose of technology demonstration, in a FCC Part-90 public safety environment. This correspondence requests an expedited application review process in keeping with the urgency of the public safety mission associated with this activity.

The applicant is currently an FCC Part-90 licensee, and all agencies that have agreed to cooperate in this effort, via cooperative agreements (MOU's), are also currently Part-90 licensees. No new frequencies are being requested. Frequency sharing agreements, for the purpose of mutual aid, are authorized cooperatively by way of inter-agency written cooperative agreements or memorandum of understanding (MOU) as outlined in FCC rules: FCC CFR47 §90.421 – Operation of mobile station units not under the control of the licensee. There are no federal frequencies requested in this application.

Background:

The Town of Orangetown, NY (the applicant) has entered into a formal agreement with NIJ CommTech program, via the National Law Enforcement & Corrections Technology Center – Northeast (NLECTC-NE), to demonstrate, exercise, and derive lessons learned from the application of multiband/software defined radio (SDR), technology to address multi-band voice interoperability in a public safety environment. This project has been facilitated to demonstrate and test multiband (SDR) end user radio equipment not currently available to FCC Part 90 users (currently not Part-90 type accepted). Specifically, the purpose of this project is to demonstrate technology as outlined in

- CFR47 §5.3(d); Technical demonstrations of equipment or techniques and
- CFR47 §5.3(k); Types of experiments that are not specifically covered under paragraphs (a) through (j).

Software Defined Radio (SDR) and multiband radio technologies are quickly maturing, and are complimentary in nature. Many people in the public safety community believe that this type of technology will ultimately provide a key piece of the overall technological solution space, easing many of the existing communication issues faced by the Public Safety community on a daily basis. There are many technological approaches to solving the many technical issues associated with public safety communications. Many of these approaches will rely upon massive infrastructure upgrades, construction of large IT overlays (in the case of VoIP overlays), and even the use of commercial services, or commercial technologies (in the case of the forthcoming 700MHz broadband network). It is very unlikely, and perhaps impractical, to expect any of these technology profiles to completely solve the numerous issues facing public safety communications. Unfortunately, in many cases, these solutions do not fully address the need for a flexible “end-user” technology that has the potential to interface with many legacy land-mobile radio systems.

Multiband, multi-protocol, end user equipment presents the unique opportunity to interface with a large percentage of, but not all, legacy LMR systems. It is well understood that there are many waveform issues as well as commercial IPR issues that will prevent practical implementation of a 100% interoperable device for all existing land mobile radio technology. But, this technology will address many communications issues that impede effective

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response to daily emergency response as well as many homeland security issues associated with law enforcement and related efforts. The NIJ Communications Technology program (NIJ CommTech), via this pilot effort, seeks to examine issues associated with the deployment of this multiband technology in a public safety environment, to facilitate an understanding of both the benefits as well as unforeseen issues associated with this technology. Issues that can be identified and collected as lessons learned for the overall benefit of the public safety community.

As noted in the application overview, for the purposes of this application, all of the requested frequencies associated with this application are already coordinated and authorized by the FCC. This experiment will simply exercise technology not currently available to current Part-90 Public Safety licensees.

The research project associated with this application is sponsored through the Department of Justice (DOJ), specifically, via a cooperative agreement sponsored by the National Institute of Justice (NIJ), via the National Law Enforcement and Corrections Technology Center, Northeast (NLECTC-NE). The NIJ (via NLECTC-NE and the NIJ CommTech program) has sponsored support for this activity through the funding of technical support, manpower, and materials to demonstrate the potential of this technology in regard to public safety interoperability. As a result, NLECTC-NE and the Town of Orangetown, NY have executed a formal cooperative agreement/Memorandum of Understanding (MOU) to participate this pilot, or demonstration program.

NLECTC-NE will document the results of this program in the form of an operational assessment for the benefit of the public safety community and the CommTech Technical Working Group (TWG). The TWG is comprised of a group of sworn public safety practitioners that define key topics/areas of interest for the NIJ Communication Technology Research and Development program. For reference and additional information in regard to NIJ CommTech and NLECTC-NE programs:

- NIJ CommTech Program
<http://www.ojp.usdoj.gov/nij/topics/technology/communication/welcome.htm>
- National Law Enforcement & Corrections Technology Center (NLECTC-NE)
<http://www.justnet.org/nlectcne/>

Sincerely,

Philip Harris

NIJ CommTech Program

<http://www.ojp.usdoj.gov/nij/topics/commtech/>

National Law Enforcement & Corrections Technology Center (NLECTC-NE)

<http://www.justnet.org/nlectcne/>

Senior Communications Engineer

315 339 6184 office

315 525 3368 Cell

philip.harris@l-3com.com