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UNITED STATES HOUSE OF REPRESENTATIVES
COMMITTEE ON ENERGY AND COMMERCE
SUBCOMMITTEE ON COMMUNICATIONS, TECHNOLOGY AND THE INTERNET

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Chairman Boucher, Ranking Member Stearns and members of the Subcommittee:

AT&T appreciates the opportunity to discuss the best means for public safety organizations to benefit from the implementation of interoperable wireless broadband capabilities. As AT&T has been a leader in providing wireless data capability to the public safety community for over a decade, we have a unique perspective on these issues, and are as committed as ever to contributing to viable and cost-effective solutions.

Fundamentally, AT&T supports the deployment of regional wireless networks to address the need for robust and interoperable broadband capabilities to meet the needs of local public safety organizations, particularly first responders. The reason is simple: local public safety agencies best understand their specific requirements and challenges and need the flexibility to choose a network management model that meets those needs.

Specifically, AT&T supports a rational new approach that enjoys the widespread support of the public safety community – one that goes beyond the more entrenched notions of either mandated network-sharing requirements, on the one hand, or a prohibitively expensive all-Greenfield approach on the other – that would dramatically reduce the cost of a typical

broadband deployment and still ensure that local public safety institutions enjoy flexible, next-generation capabilities. This so-called "Leveraged Network Model" would entail the following:

- First, Congress should reallocate the 700 MHz D Block (758-763 MHz and 788-793 MHz bands) to public safety to ensure state-of-the-art broadband capability with sufficient capacity (20MHz), as public safety is requesting.

- Congress or the FCC should mandate the use of the 3GPP LTE air interface standard to ensure interoperability nationwide and the ability to share in economies of scope and scale with commercial providers in the 700 MHz band.

- Local public safety organizations should take advantage of existing grant and procurement programs to fund their deployments, such as Urban Area Security Initiative grants, Community Oriented Policing grants, or grants from the Department of Homeland Security Office of Emergency Communications.

- Eligible public safety entities would issue RFPs for construction of regional public safety networks that would leverage existing commercial infrastructure to minimize costs, maximize efficiency, and ensure rapid deployment. This process therefore would allow public safety to determine capital and operational expense projections and select the network management model that best meets their needs.

- The commercial operator and the local public safety license holder would enter into a spectrum leasing arrangement allowing the commercial operator to host public safety-dedicated radio access network equipment that is connected to the operator's core network.

In short, the Leveraged Network Model would provide a dedicated, private network experience that nonetheless relies in part upon the core infrastructure and provisioning, support and billing systems of a commercial operator. As such, this model would address two primary concerns of public safety: it would give them exclusive access to spectrum, eliminating the concern of sharing with commercial users, and materially reduce overall costs. In addition, commercial devices that have been provisioned with a unique network code would be deployed to allow for exclusive, non-commercial access to the dedicated 700 MHz RAN equipment; but, should a user leave the public safety footprint, the same devices would work as ordinary commercial

subscriber devices.[1]

Moreover, a key component of this Model is that – consistent with the unanimous recommendation of the public safety community – it would utilize LTE as the common technology standard. The LTE standard would benefit public safety in many ways. First, it would assure that each network, even those built independent of each other, will allow seamless roaming for visiting public safety users. Second, it would encourage early deployment of this new technology and build momentum among public safety agencies such that, as more regional networks are deployed, they would form the backbone of a "network of networks" that would ultimately provide public safety with interoperable broadband across the country. Third, it would allow public safety to leverage the massive economies of scale of the commercial operators who are also deploying LTE in the 700 MHz band. Fourth, it would allow a region to confidently design and deploy a network knowing it will be interoperable with later-deployed networks.

Finally, while some might argue that public safety already has sufficient spectrum, in reality, only by re-allocating the D Block as public safety spectrum – and thereby providing a full 20 MHz of broadband capacity – would policymakers ensure that the public safety community will keep pace with next generation wireless data applications. In addition to traditional applications such as license plate retrieval and criminal history inquiries, public safety needs network capacity for bandwidth intensive 4G applications, including optical recognition systems, streaming video, VoIP applications, and collaboration tools that cannot be supported with the existing spectrum allocation. A full 20 MHz allocation now, utilizing the

[1] Indeed, AT&T has recently asked its device vendors to look into the feasibility and cost of adding the combined public safety and D Block bands into commercial devices. While we are still evaluating the results, early indications are that a device with that capability is feasible in the late 2011, or 2012 timeframe at or near commercial prices.

LTE standard, would allow the deployment of a single base station radio and devices that utilize the contiguous spectrum, which is far superior to a system whereby public safety must continually add non-contiguous spectrum – all of which would require new equipment and additional taxpayer expense.

Public safety is unique in that, during an incident or emergency, network demand is typically concentrated in a small geographic area. While commercial carriers can deploy additional capacity at pre-planned events, public safety does not have the luxury of planning the next disaster or incident that will likely involve multiple jurisdictions in a defined geographic area. Therefore, having the full 20 MHz throughout a broadband deployment would provide public safety the additional capacity when needed most - during emergencies.[2]

In closing, we encourage you to engage the public safety community on these proposals directly as they would be the true beneficiaries of them. However, AT&T feels strongly that this is the best opportunity to provide public safety with the broadband capability that it needs in pursuit of its mission. It is simply the right thing to do.

[2] In the end, implementation of the Model can assist with wireless broadband deployment in small and/or rural communities. To the extent smaller, rural communities do not fully utilize the entire 20MHz allocation, they can and should enter into public-private partnerships to allow for commercial applications over the non-public-safety portion of the spectrum. In this way, the local community could benefit from cutting edge wireless broadband technology and dedicated broadband capabilities for public safety; the spectrum would otherwise be fully and efficiently utilized for a range of applications; and the local community – through the partnership – would attain a revenue source to further fund its public safety and other initiatives.