



# FirstNet™



## Notice and Comment Response Summary

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December 9, 2014

# First Notice and Comment Process Overview



FirstNet initiated its first public notice and comment process seeking comments on certain legislative interpretations under the Act

- Date of Release: September 24, 2014
- Who Could Comment: Any individual or organization
- Comment Deadline: October 27, 2014
- Comments Posted: Publically available at [www.regulations.gov](http://www.regulations.gov)

# Notice and Comment Process Overview

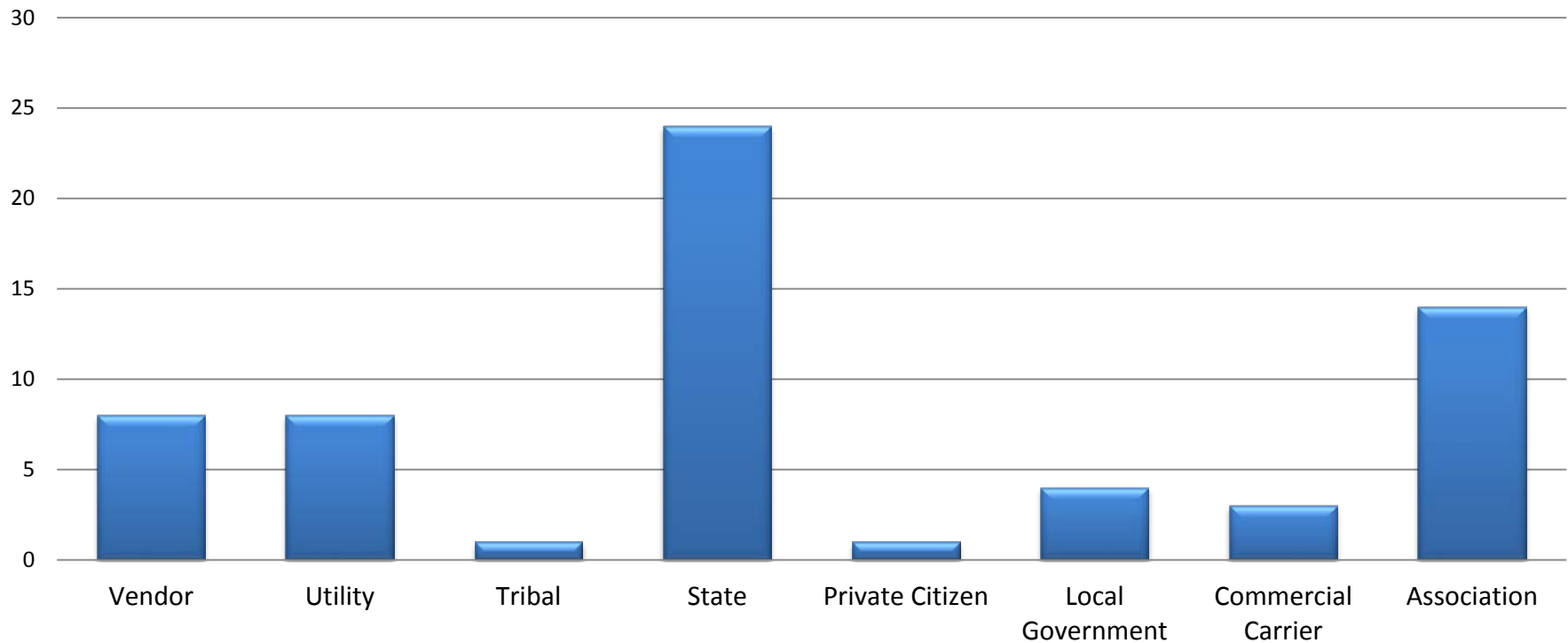


- The Notice sought comment on key topics including:
  - Network elements, including “core” and “RAN”
  - Network users, including “public safety entity,” “secondary” and other network users
  - Permitted services
  - RFP standards for “open, transparent, competitive” process
  - Definition of “Rural” and substantial rural coverage milestones
  - Existing infrastructure sharing
  - Fees, including covered leasing fees
- FirstNet will consider comments for purposes of informing the RFP process, interpreting the Act, and establishing network policies
- We have made no final determinations, and today is an update on comments received generally and will not hit on every comment. Numbers and positions of commenters are approximations

# Overview: Public Notice Responses



Summary of Responses Totals  
by Organization Type



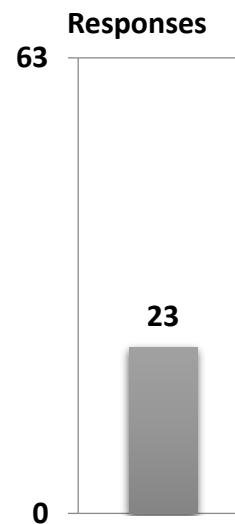
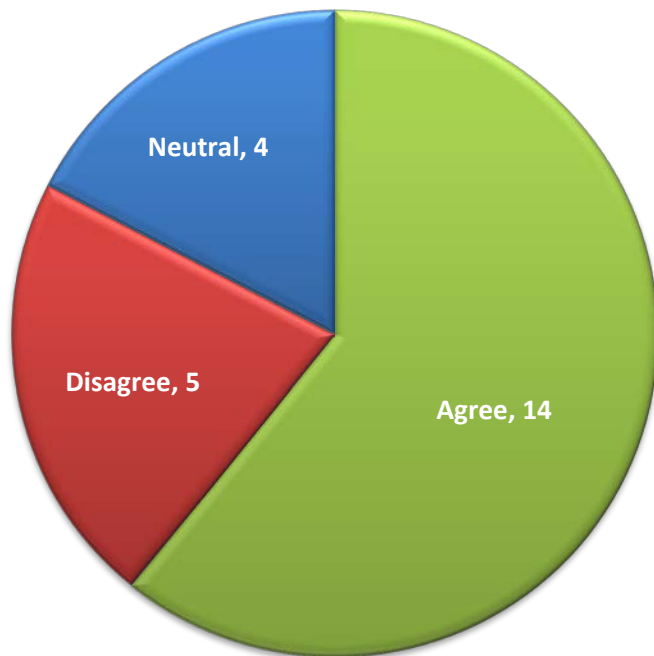
A total of **63** responses were received from various groups, including State, local and Tribal governments, commercial carriers and vendors, and associations.



# Topic: Definition of “RAN” and “Core”



The Notice Interpretation: core includes EPC elements, device services, location services, billing functions, and all other network elements and functions other than the radio access network, which consists of all cell site equipment, antennas, and backhaul equipment required to enable wireless communications with devices, including standard E-UTRAN elements

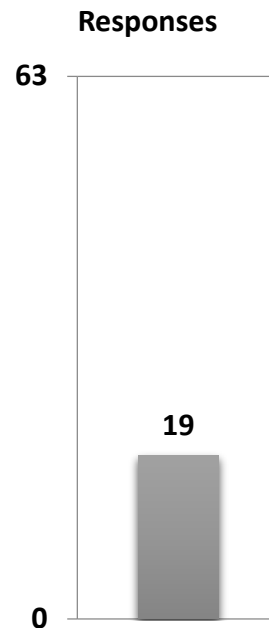
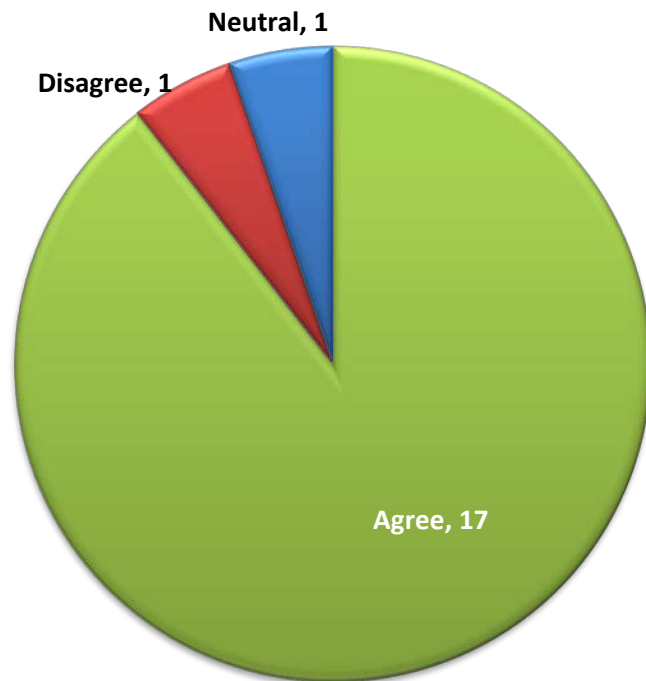


- Agree: majority of comments agreed with the proposed interpretation
- Disagree: sought an interpretation that would allow state and local administrative and application capabilities in addition to the national core
- Neutral: requested more specific “demarcation points” for clarity in determining the extent of backhaul services and facilities included in the RAN

# Topic: Opt-out RANs use FirstNet Core

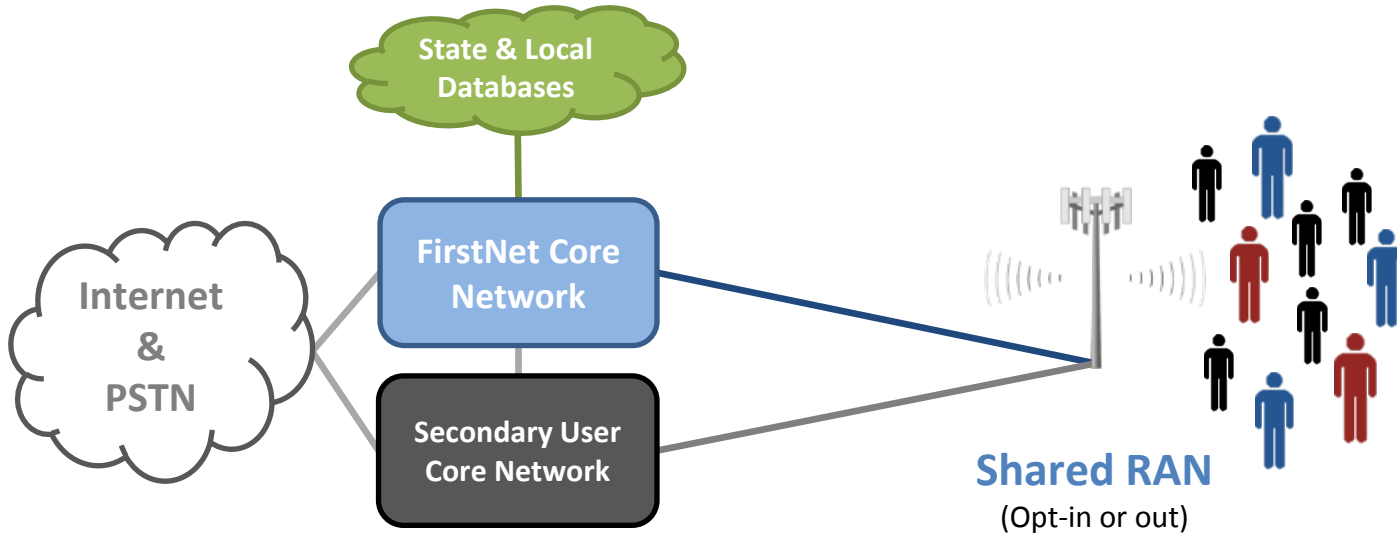


The Notice Interpretation: Opt-out State radio access networks must use FirstNet Core to provide service to public safety entities



- Agree: majority of comments agreed and indicated the proposed interpretation was key to ensuring the interoperability of the network
- Disagree: local cores for opt-out states can be interoperable following close testing, etc.
- Neutral: interpretation is sensible, but FirstNet should also ensure that opt-out states maintain an appropriate level of local control, priority, and quality of service so that the functionality of the network meets local requirements; subject to fixing core definition

# Topic: “RAN” and “Core” Overview



- State & Local Databases  $\neq$  FirstNet Core Network and can be directly connected to the FirstNet Core
- Considering the extent to which opt-out States could have certain separate network functions from the FirstNet Core Network if interoperability and priority/preemption for public safety are not affected – per FirstNet Network Policies



# Topic: Advances in Technology



The Notice requested comments on FirstNet's obligations to accommodate advancements in technology

## Comment Summary

- Interoperability Report contained provisions anticipating advances in technology and the evolution of the standards recommended in the Report
- Any changes made in an effort to conform to the evolution of 3GPP standards are non-material
- FirstNet should be able to make changes to the recommendations to accommodate advances in technology and that take into account issues that the Interoperability Board may not have considered

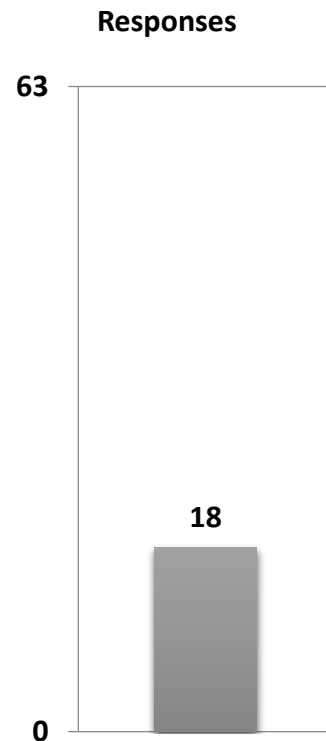




# Topic: Leveraging Existing Infrastructure



The Notice Interpretation: Section 6206(b)(1)(C ) is intended to require FirstNet to encourage, *through* its requests, that responsive proposals leverage existing infrastructure

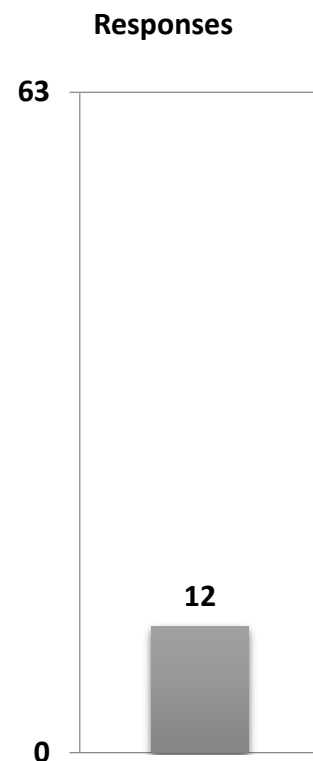
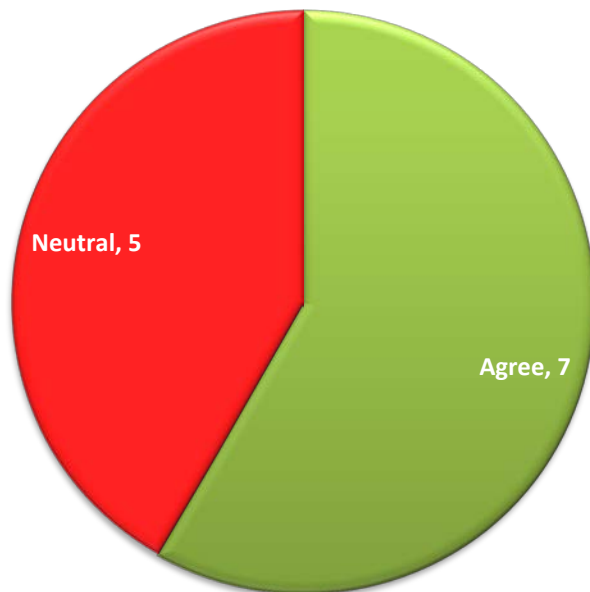


- Agree: all responses agree with this interpretation
- Disagree: no responses
- Neutral: no responses

# Topic: Who Determines Economic Desirability



The Notice Interpretation: FirstNet, rather than the supplier, should make the “economic desirability” assessment under Section 6206(b)(1)(C)



- Agree: FirstNet is responsible for evaluating and ultimately concluding whether a proposed partnership would be economically desirable
- Disagree: no responses
- Neutral: FirstNet should determine an acceptable to unacceptable range for the economic desirability assessment and supplier should determine the economic desirability assessment based on the FirstNet provided range

# Topic: CLA “dark fiber”



The Notice requested comments on the meaning and context of “dark fiber” as used in the Act

## Comment Summary

- Arizona agrees with the proposed interpretation





**FirstNet**<sup>TM</sup>



**Thank You**