



30 June 2009

**Ralph Haller**  
**Chair, NPSTC Executive Committee**

Subject: Recommendation to endorse WiMAX for 700 MHz Public Safety Broadband

Dear Mr. Haller,

The WiMAX Forum has reviewed the 10 June NPSTC Press Release entitled "[NPSTC Votes To Endorse LTE Technology for Broadband Network](#)." In accordance with the relevant [Reconsideration Protocol](#), the WiMAX Forum requests that the issue be revisited by the NPSTC Board and therefore submits, in this letter, rationale for revisiting the decision.

The WiMAX Forum is an industry-led, not-for-profit organization formed to certify and promote the compatibility and interoperability of broadband wireless products based upon IEEE Standard 802.16.

The WiMAX Forum believes that WiMAX technology is best suited to the development of a nationwide interoperable broadband network in the 700 MHz public safety band. A WiMAX network would offer a robust, high-throughput, low-latency platform with the additional benefits of broad industry adoption, a wide ecosystem, growing certified multi-vendor interoperability to provide a competitive marketplace, and a roaming program to ensure easy roaming of devices across a variety of networks.

The WiMAX Forum takes note of the NPSTC vote to "endorse LTE (Long Term Evolution) as the favored technology standard most suited to the development of a nationwide interoperable broadband network in the 700 MHz public safety band." The Forum believes that the NPSTC members would benefit from further evaluation of this decision in light of the benefits of a more inclusive policy including WiMAX as another endorsed technology.

The WiMAX Forum publicly expressed serious interest in this issue in [comments to the FCC in November 2008](#). At that time, the Forum said "The WiMAX Forum interest is to provide the latest wireless broadband technology and services to all consumers, both commercial and public safety users. The WiMAX Forum has committed in its technology roadmap a Frequency Duplex Division (FDD) and Time Duplex Division (TDD) mobile solution for the 700 MHz bands. That commitment will result in the development of a WiMAX 'profile' enabling a community of manufacturers to provide interoperable and standards-based client devices and base stations for networks in this band." Since this FCC filing, the Forum has progressed its commitment by agreeing to certification profiles for FDD and TDD operation (including dual-mode mobile devices) at 698-862 MHz.



The WiMAX Forum has more than 450 members, comprising the majority of operators, component vendors, and equipment vendors in the communications ecosystem. This ecosystem is robust, in part because the Forum does not operate in isolation but in partnership with many other technical and standardization bodies. For example, the WiMAX Forum develops complete end-to-end specifications that refer extensively to open standards developed in other bodies. Many of the specifications are based on IEEE Std 802.16, developed in a decade-old worldwide activity that currently counts 449 members on its roster. This activity ensures that the fundamental technology remains at the leading edge but is balanced against requirements for practical deployment. The WiMAX Forum and IEEE have collaborated to win recognition for their common solution within the ITU's IMT-2000 standard, and backward-compatible enhancements will continue to track the ITU's developments through the next decade.

One key value added by the WiMAX Forum results from its complete end-to-end specification process. The Forum's technical activities do not conclude with the development of technical protocols (known in industry as Stage 1, 2, and 3 specifications). The Forum continues with a full six-stage specification process that leads all the way through to certification, which the WiMAX Forum oversees to ensure compliant and interoperable products. This assurance allows all customers – from large multinational carriers to local government communications networks – to be assured of access to reliable and interoperable equipment from a variety of manufacturers to meet a variety of needs.


The Forum understands that roaming is a key NPSTC requirement. We also understand that interoperability at the air interface is only one element in true roaming capability. As such, the WiMAX Forum's mature Global Roaming program <<http://wimaxroaming.org>> was developed to ensure that secure and authenticated home-network applications – not simply raw Internet access – are fully supported when users travel onto visiting networks. This program can alone justify NPSTC reconsideration of its 10 June decision.

We ask that NPSTC consider that the 700 MHz band, while offering excellent coverage of the sort that NPSTC members require, may not offer sufficient capacity for all public safety needs. The public safety community can benefit from using a technology that is deployed commercially in other bands, because this would allow practical devices that could roam onto high-capacity commercial networks that are becoming widely available, in many cases through companies that are members of the WiMAX Forum.

Should NPSTC be open to reconsideration, the WiMAX Forum would be pleased to interact with NPSTC to learn more about its requirements, review Forum programs in-depth, and introduce our members with special expertise and interest in NPSTC programs.

We urge the NPSTC Member Organizations to use this opportunity to reconsider the 10 June decision and take the time to investigate the advantages of WiMAX networks for meeting and exceeding public safety requirements. We look forward to a positive response and to an opportunity to engage more comprehensively in constructive dialog.

Regards,

A handwritten signature in black ink, appearing to read 'M. Shakouri', is centered on the page. The signature is fluid and cursive, with a prominent initial 'M' and a final flourish.

Dr. Mohammad Shakouri  
Acting President and Chairman, WiMAX Forum

cc: Douglas M. Aiken, Vice Chair, NPSTC Executive Committee  
Marilyn Ward, NPSTC Executive Director  
NPSTC Member Organizations