November 9, 2012

National Telecommunications and
Information Administration
U.S. Department of Commerce
1401 Constitution Avenue, NW
HCHB Room 7324
Attn: FirstNet NOI
Washington, DC 20230
firstnetnoi@ntia.doc.gov

RE: AT&T's Comments in Response to NTIA's Notice of Inquiry
Development of the Nationwide Interoperable Public Safety Network
Docket 120928505-2505-01 [RIN 0660-XC002]

Dear Sirs/Mesdames:

Attached please find the Comments of AT&T Services, Inc. in the above-referenced docket. AT&T has been an active participant in the Public Safety Broadband Network initiative since its inception in 2007 and appreciates the opportunity to share these Comments.

The FirstNet Public Safety Broadband Network (the "Network"), for the first time in history, will allow public safety and commercial wireless operators to share common frequency bands, air interface technologies and a global standard. This trifecta will present a unique opportunity for public safety to deploy a cost-effective nationwide broadband network that leverages the massive economies of scale enjoyed by commercial operators. With that in mind, AT&T's comments emphasize the following:

- Primary use of the Network should be limited to entities that directly provide public safety services, as outlined in the Act;
- The Network should be based on open standards technologies to promote interoperability and management of costs;
- The Network architecture approach selected by FirstNet should provide a clear business model that incents commercial operator participation;
- A Network architecture business model that involves disaggregating wireless provider networks may not incent those providers to participate with FirstNet, whereas providers may foresee advantages in a business model that involves FirstNet users roaming on their networks while FirstNet builds out the Network;
- Backhaul and other scaled connectivity with a commercial operator is possible, pending FirstNet's requirements for Network hardening and performance, geographic alignment with commercial operators' network footprints, and a commercially reasonable economic model; and

- Multi-operator/multi-band public safety devices will be technically challenging to develop, which may result in low scale, high cost devices.

AT&T looks forward to a more detailed discussion of these and other issues during oral presentations or further discussions directly with FirstNet and the NTIA. If NTIA or FirstNet has any questions, please feel free to contact the undersigned directly.

Best Regards,

/s/ Jim Bugel

Jim Bugel
Vice President—Public Sector
AT&T Business Solutions
Jim.bugel@att.com
(202) 457-2502

Stacey G Black
Assistant Vice President Market Development
AT&T Public Safety Solutions
Stacey.black@att.com
(202) 457-2290