

November 14, 2006

The Honorable Kevin J. Martin  
Chairman  
Federal Communications Commission  
445 12th Street SW  
Room 8-B201  
Washington, DC 20554

*Submitted electronically*

Dear Chairman Martin:

On behalf of RACOM Corporation, I am writing to express support for Cyren Call Communications' proposal (FCC RM No. 11348) to build a nationwide, wireless broadband network for public safety.

RACOM is uniquely positioned to comment in this proceeding because we own and manage one of the largest digital communications systems in the country serving nearly 10,000 users, many of which are public safety entities, with thirteen branch offices in six states. We initiated the trend of public safety public/private partnerships enabling public safety to share capacity on third-party communications networks and eliminating the need for an entity to purchase an entire, expensive radio system. These networks are shared among many users, cover large geographic areas and address the need for interoperability among public safety and public service organizations. In short, we provide service on a regional scale similar to what Cyren Call proposes on a nationwide basis. We have been in business for decades successfully serving public safety. The 50,000,000 voice and data calls that go through the RACOM Network each month are a testimony that Cyren Call's concept works and is needed by Public Safety. The proposal needs to become reality.

The only feasible manner of building a nationwide, IP-based network for public safety is to allocate spectrum to public safety on a nationwide license with sufficient capacity to serve both public safety and commercial operators, establish specifications that meet public safety's demanding criteria and create a public/private partnership to fund construction of the network.

Our nation has an exceptional opportunity to use a contiguous, 30 MHz block of frequencies in the upper 700 MHz band to provide public safety an advanced, nationwide communications network that would be controlled by public safety and harness the economic benefits of a shared public/private partnership with commercial wireless operators. The key elements of Cyren Call's proposal include (1) reallocating the 30 MHz block of frequencies from the planned auction of 700 MHz spectrum to public safety; (2) licensing the 30 MHz of spectrum to a Public Safety Broadband Trust that would control and manage the spectrum, (3) designing a next-generation IP-based nationwide network with extensive terrestrial coverage and satellite capabilities – all built to public safety specifications, (4) using private capital to fund a

public/private shared network, and (5) enabling commercial operators to use excess capacity on the network, but giving public safety priority access. This proposal is innovative and, for the first time, cohesively resolves on a nationwide basis the multitude of problems contributing to public safety's communications problems by joining public and private interests.

I urge the FCC Commissioners, Congressional Representatives and other decision-makers in Washington, D.C. to fulfill their obligation to act in the public interest. Time is of the essence and if action is not taken quickly, the frequencies will be auctioned in early 2008 for commercial purposes and this opportunity will be lost forever. Please prioritize public safety by approving Cyren Call's proposal and creating a Public Safety Broadband Trust.

Sincerely,



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