# Issues Providing "P25 Compliant" Radios To First Responders

Compliance Testing LLC Michael Schafer, President

Michaels@ComplianceTesting.com

Chris Lougee- Director of New Business
Chrisl@ComplianceTesting.com

**NPSTC 2016** 

## Why are we here? NPSTC:

- 1. Understands the industry needs and concerns
- 2. Got FCC to add P25 on 700 MHz Rules
- 3. Works with TIA developing basic tests
- 4. Knows the Importance of CAP to its members
- Interoperability is key

#### NPSTC Members would benefit from:

- More LMR equipment tested sooner
- More competitive pricing
- **ISSI** Tested
- CSSI Tested

#### First Responder Priorities

- Communication, Communication, Communication with all agencies at a disaster
- 2. Access to new technologies readily available now
- 3. User-Friendly Equipment (plug & play)

## Original P25 Objectives- via CAP

- Interoperability
- Pricing Competition in Procurements
- Graceful Migration (Backward & Forward)
- Spectrum Efficiency

#### LMR Manufacturer Priorities

- 1. Keep testing costs down
- 2. 52 weeks/yr access to all testing at one location
- Opportunity for small radio manufacturers to compete on a level playing field

# Interoperability

- 1. TIA-102 suite of P25 Test standards
  - 80+ Standards documents completed
  - Interoperable digital Project 25 equipment
- 2. Compliance Assessment Program
  - Improve confidence in purchasing
  - P25 features and services offered comply with P25 standards
  - Capable of interoperating across manufacturers
  - Ability to communicate with all parties
- 3. Never more important Terror Risks

#### New Technologies

- 1. New products trying to come to market...NOW!!!
  - But Can't get proper P25 testing done
  - New P25 features and services added sooner
  - New options to chose from sooner
  - 700 MHz PS spectrum available for P25 compliant radios
- 2. Plug and Play = Easier to implement!

Affordable = Best Value for end users

#### P25 CAP is Back

- 1. New DHS P25 CAP Advisory panel
- DHS has appointed a new Program Manager
- 3. New APCO P25 program manager
- 4. NPSTC asks FCC to require CAP testing (700Mhz)
- 5. FCC issues R&O (Report & Order)
- Increased demand for P25 compliance testing by industry and end users

### P25 Issues

Radios must be tested to ensure P25 compliance Can't get new technologies CAP tested, timely, affordably

Manufacturers can't bring new technologies to market First responders can't deploy enhanced technology How will ISSI – CSSI testing be accomplished?

## Vho is best to do CAP Testing?

- 1. A Competitive Manufacturer?
- 2. An Independent Lab?
- 3. Key considerations
  - Cost effective, Timely
  - Impartiality Unbiased
  - Independent
  - Objective
  - Credible
  - Trustworthy

#### Competitor's Lab Issues

- 1. Can I get in, in time? So sorry, you missed the RFP date
- 2. How comfortable are manufacturers testing at a competitor's lab?
- 3. Opens IP to the competitor
- 4. "Product issues" exposed to competitor
- 5. Can a competitor really be objective / impartial?
- 6. Could testing delays cause missing a big RFP deadline?

nber 2016 - NPSTC

#### Independent Lab Issues

- 1. No logical viable sustainable business model
- 2. Low volumes of testing cannot support the investment and staffing, maintenance
- 3. Start up costs too high
- Ongoing staffing, ISO audits, SME's, support, <u>all</u> very costly
- 5. Cost of testing prohibitive to LMR manufacturers, especially small ones
- 6. Loss of Small LMR co's to P25 costs

# Multi-Site Manufacturer Labs vs. One Stop Independent P25Lab

- 1. P25 Testing must occur at 3 or more labs in 3 different locations at 3 different times
- 2. CAP ISSI never been done
  - Impractical to Impossible
  - Too difficult logistically
  - Too much cooperation & coordination required between competitors

# US Public Safety Communications Investment ISSUES

- 1. Stated PSCR positions are...
  - "Protect your infrastructure investment through the intersection of the two technologies"
  - "Extend the life of your existing system while beginning to build the new."
- 2. New First Responder technology has received over \$100M+ via spectrum sale
- Current LMR infrastructure in need of financial for appropriate P25 Testing. Est \$20-25mm

# Solution- One Stop Independent P25 Lab

- 1. Independent=UNBIASED-IMPARTIAL
- 2. All LMR Testing under 1 roof, 1 trip
- 3. ISSI & CSSI testing available
- 4. Open all year for testing vs 2 weeks per year
- Fully equipped & Staffed
- 6. Accredited to ALL P25 Standards & FCC
- Expected Start up Costs \$5-10M set up
- \$2-3M / year operational expenses
- \$4-5mm / yr to test all company's radios

#### Budget for P25 One Stop Independent Lab

|  | Current Test<br>Volumes | Expe | ected Test Volumes |
|--|-------------------------|------|--------------------|
| Description                                | Low                     |      | High               |
| Start up costs                             | \$<br>5,000,000         | \$   | 10,000,000         |
| Operational costs/ yr                      | \$<br>1,000,000         | \$   | 3,000,000          |
| All testing /yr<br>covered for LMR<br>mfgs | \$<br>2,500,000         | \$   | 5,000,000          |
| 5 year total                               | \$<br>22,500,000        | \$   | 50,000,000         |
| Avg Cost Yr                                | \$<br>4,500,000         | \$   | 10,000,000         |

#### Current Status P25 - ISSUES?

- 1. New CABS just published 8/10/16
- 2. Previously "P25 Accredited" test labs ... expire 8-2017
- 3. Retesting of all radios to new standards by 8-2017
- Labs must be re-accredited within 1 year to a new DHS Lab requirement ISO17025
- Previously accredited labs may continue testing thru Deadline

# Field issues force Consideration of Deeper understanding of Test ISSUES

- 1. "Model Class" Test ~ "Test the Parent" and assume "similar family" models would also pass, would they really pass?
- 2. Firmware changes Ought they be tested?
- 3. Theoretical vs Practical application "This ought to be ok, so we shouldn't need to test it" We are motivated (biased) to reduce not increase testing.
- Conformance Testing Not ready, but objective is easier plug & play" LMR implementations
- P25 Testing for LMR vendors could become prohibitively expensive to meet "plug & play" goal, especially smaller Co

## otential Solution- Federal Funding

olves all the issues:

- New P25 Radios & equipment to First Responders sooner
- Much easier to get through testing for LMR manufacturers
- No testing fees means, Small LMR manufacturers are not put
- out of business or out of P25 participation
- Keeps Equipment Costs down for Cities Users
- More testing aids "Plug and Play" objective
- Both Model Class & Firmware changes get tested

# Requests of NPSTC

Send a letter of support to DHS
Propose Federal Funding source suggestions

# Questions? Compliance Testing LLC Michael Schafer, President

Chris Lougee
Director of New Business

Chrisl@ComplianceTesting.com