

Department of Homeland Security
Office for Interoperability and Compatibility (OIC)
Public Comment Feedback Matrix for Minimum Feature Requirement
Draft Compliance Assessment Bulletin (CAB) July 2017

#	Received Comment	Project 25 (P25) CAP/OIC Response
1	<p>Section 1.1, paragraph 1 is not entirely true in that the 2017 grant guidance does not require Compliance Assessment Program (CAP) documentation. We suggest that the statement in paragraph 1 be replaced with the statements used in the 2017 Common Air Interface (CAI) CAB.</p>	<p>Update paragraph to indicate that grantees are strongly encouraged to purchase equipment that is compliant to P25 standards.</p>
2	<p>Section 1.1, paragraph 2 states: “The P25 CAP Advisory Panel (AP) has defined P25 features and capabilities that shall be included in the P25 equipment purchased by the applicant.” This statement places a CAP requirement on equipment being purchased by the applicant. It is not clear who the applicant is or what is being applied for by the applicant. We understand that CAP may create requirements for the content and format of Suppliers’ Declaration of Compliance (SDOC)/Summary Test Report (STR) documents and that CAP may create requirements for federal grant eligibility. It is not clear if the statement above applies to either or both. If this document is placing requirements on equipment for federal grant funding applicants, this needs to be clearly stated. If this document is placing requirements on equipment for SDOC/STR posting applicants, this needs to be clearly stated.</p>	<p>The paragraph will be re-written to improve clarity.</p>

Department of Homeland Security
Office for Interoperability and Compatibility (OIC)
Public Comment Feedback Matrix for Minimum Feature Requirement
Draft Compliance Assessment Bulletin (CAB) July 2017

#	Received Comment	Project 25 (P25) CAP/OIC Response
3	<p>Section 1.1 paragraph 2 states that this CAB lists the tests that are found in the 2016 CAI CAB that are used to verify that functionality covered by this CAB is included in the purchased equipment.</p> <p>It appears that equipment must be able to pass the tests listed in this CAB in order to be considered compliant to this Minimum Feature Requirements CAB.</p> <p>If this is a correct interpretation, we suggest that compliance to this CAB be more clearly described. Note: We seek this clarification because this CAB seems to follow the new CAP paradigm initiated with the Encryption Requirements CAB. In that new paradigm, equipment with posted SDOC/STRs is considered “CAP Compliant” (even though certain tests may not have been executed because the functionality covered by a test may not be supported), while at the same time that equipment may be considered non-compliant to a CAB that requires that certain equipment support certain functionality. This differentiation is difficult to explain to customers. In the context of the Encryption Requirements CAB, during the June 2017 P25 Steering Committee meeting, the CAP AP vice chair stated that the term “CAP Compliant” means the SDOC/STRs for that equipment have been posted to the CAP website and that same equipment may be considered “Encryption Requirements CAB non-compliant” if that equipment includes any encryption algorithm without also including AES 256.</p> <p>As an example in the context of the Minimum Feature Requirements CAB, this CAB includes repeater NAC §7E functionality and includes a test of that functionality that is also found in the 2016 CAI CAB. It is our understanding that equipment with an STR that states the repeater NAC §7E test was not executed (because the functionality is not supported) would be considered CAP Compliant, while also being considered non-compliant to the Minimum Feature Requirements CAB.</p> <p>The comment above is not intended to challenge or criticize this new CAP paradigm. The comment is only intended to ensure we understand what compliance to this CAB means and how “Minimum Feature Requirements CAB compliance” may or may not differ from “CAP Compliance.”</p>	<p>The paragraph will be re-written to improve clarity.</p>

Department of Homeland Security
Office for Interoperability and Compatibility (OIC)
Public Comment Feedback Matrix for Minimum Feature Requirement
Draft Compliance Assessment Bulletin (CAB) July 2017

#	Received Comment	Project 25 (P25) CAP/OIC Response
4	<p>In section 1.3, we believe reference 2 should be TIA-102.CABA instead of TIA-102.BACA.</p> <p>We also note that reference 3 (TIA-102.BAAC-C) has been superseded by TIA-102.BAAC-D (published June 2017).</p>	<p>Noted and agreed.</p>
5	<p>Section 2 states: “If P25 subscribers meet these minimum feature set, they can conduct the P25 CAP testing as defined with the CABs. If the SDOC and STRs are approved, they shall be considered P25 CAP approved. Subscriber transceivers that do not meet these feature requirements, shall not be considered P25 CAP approved.”</p> <p>This implies but does not clearly state that SDOCs and STRs must indicate that equipment under test has passed the tests listed in this document in order to be approved for posting on the CAP website.</p> <p>If the intent of this CAB is to require certain tests be passed in order to be considered for posting on the CAP website, then this should be clearly stated.</p> <p>If the intent of this CAB is to require certain tests be passed in order to be considered CAP approved for the purposes of federal grant eligibility, then this should be clearly stated.</p> <p>Note that in either interpretation of the current text, subscriber transceivers intended for trunking operation only will be considered non-compliant, and manufacturers of trunking only transceivers will be prohibited from participating in CAP. If this is not the intention of this CAB, then this CAB should clearly state what type of equipment this CAB applies to.</p> <p>These same points apply to the section 3 introductory text.</p>	<p>This testing is to verify P25 conventional interoperability for a limited feature set, independent of frequency band. While trunking only subscribers for public safety are certainly a technological possibility, they are unlikely as public safety normally requires direct or talkaround capability, which is based on conventional operation. Failsafe or conventional fallback operation is also typically a requirement for a trunked subscriber. Nevertheless, DHS OIC is open to discussing a minimum test scope for trunking interoperability for equipment with only trunking capability.</p>

Department of Homeland Security
Office for Interoperability and Compatibility (OIC)
Public Comment Feedback Matrix for Minimum Feature Requirement
Draft Compliance Assessment Bulletin (CAB) July 2017

#	Received Comment	Project 25 (P25) CAP/OIC Response
6	<p>We note that section 2 and its subsections intend to define: “Subscriber P25 CAP Minimum Feature Requirements” and that section 3 and its subsections intend to define: “Base Station/Repeater P25 CAP Minimum Feature Requirements.” In both sections, there is an attempt to describe the required feature and associated tests of the required feature. This approach contains errors correlating features to tests and results in tests being listed several times. We believe the document can be greatly simplified without compromising the intent by avoiding the attempt to define required features and just listing tests that equipment must pass with a short description of the functionality covered by the test.</p>	<p>The document was written so that P25 users, as well as P25 manufacturers, could see a linkage with TIA-102 message and procedures, TIA-102 test procedures and P25 CAP CAB test requirements, and how they would relate to a subscriber and base station/repeater.</p>
7	<p>What is OIC’s intent with this CAB? What P25 CAP problem is OIC intending to solve with the issue of this CAB?</p>	<p>In this CAB, the P25 CAP AP is defining the minimum conventional interoperability features and capabilities that are required for P25 subscriber and repeater equipment to be P25 CAP Compliant.</p>
8	<p>Is it correct to infer from the absence of P25 trunking from this document that DHS OIC does not intend to include P25 trunking features in the minimum requirements for P25 CAP compliance?</p>	<p>The P25 CAP AP defined the minimum feature set for P25 conventional interoperability. The P25 CAP AP decided that ‘trunking’ operation was an option and not all P25 radios would have a trunking capability.</p>
9	<p>Each feature addressed in P25-CAB-MIN-FEATURE_REQ-DRAFT-170720-508 includes a section titled “TIA Conformance.” These sections contain references to either TIA-102.BAAD-B Project 25 Conventional Procedures or TIA-102.BAAC-C Project 25 Common Air Interface Reserved Values, which are listed as Normative References in section 1.3, followed by references and lists specifying required testing. We interpret this inclusion of these sections as follows:</p> <p>a. It means that equipment suppliers’ implementation of each feature in their equipment shall comply with the information/requirements specified in the referenced TIA-102.BAAD-B or TIA-102.BAAC-C documents.</p>	<p>a. The document was written so that P25 users, as well as P25 manufacturers, could see a linkage with TIA-102 message and procedures, TIA-102 test procedures and P25 CAP CAB test requirements, and how they would relate to a subscriber and base station/repeater.</p>

Department of Homeland Security
Office for Interoperability and Compatibility (OIC)
Public Comment Feedback Matrix for Minimum Feature Requirement
Draft Compliance Assessment Bulletin (CAB) July 2017

#	Received Comment	Project 25 (P25) CAP/OIC Response
	b. It means that the subsequent lists of tests are the only ones that DHS OIC is specifying must be performed by the recognized P25 CAP labs to verify each feature in the minimum feature set on supplier equipment.	b. This document defines which conventional interoperability test cases shall be successfully passed. These test cases are part of 2016 P25 CAB for CAI testing and can be found in the <i>Project 25 - Compliance Assessment Program – Baseline Common Air Interface Testing Requirements (P25-CAB-CAI_TEST_REQ)</i> document. For the test cases in this document, failed or unsupported test case outcomes are not acceptable for P25 CAP Compliant equipment. The successful test case outcomes shall be indicated in the P25 CAP SDOC and STR documents that are submitted to DHS OIC. Once the SDOC and STR are approved, they would be added to the P25 CAP “Approved (Grant-Eligible) Equipment” list.
	c. It does not mean that recognized P25 CAP labs must develop conformance testing beyond those interoperability tests defined in the subsequent references and test lists to verify any information/requirements specified in the referenced TIA-102.BAAD-B or TIA-102.BAAC-C documents.	c. No conformance testing is required.
10	Section 1.2 <i>Normative References</i> : a. Each reference contains an index (e.g., “[1]”, “[2]”, etc.). These indexes are not used throughout the document wherever the references are made.	References removed.
11	We recommend removal of the TIA.102-CABA document from this sections.	The P25 CAP AP and OIC prefer to keep references to TIA-102.CABA in the document to show linkage between TIA and P25 CAP documentation.
12	Section 2 <i>Subscriber P25 CAP Minimum Feature Requirements</i> and Section 3 <i>Base Station/Repeater P25 CAP Minimum Feature Requirements</i> : a. We recommend the second sentence be revised as follows: “If P25 [equipment type] meet these this (sic) minimum feature set, they can conduct the P25 CAP testing as defined with the CABs.”	These paragraphs were re-written in the updated CAB.
13	b. The second sentence states “If P25 [equipment type] meet these minimum feature set, they can conduct the P25 CAP testing as defined with the CABs.” Is it the intent of DHS OIC to disallow P25 CAP testing by recognized labs on any equipment which does not meet the minimum feature set? If not, then we recommend revising this sentence to clarify and remove the implication to that effect. (It is clear that DHS OIC will not post SDOCs for equipment which does not meet the minimum feature set.)	These paragraphs were re-written in the updated CAB.

Department of Homeland Security
Office for Interoperability and Compatibility (OIC)
Public Comment Feedback Matrix for Minimum Feature Requirement
Draft Compliance Assessment Bulletin (CAB) July 2017

#	Received Comment	Project 25 (P25) CAP/OIC Response
14	<p>Section 2.1.3 <i>TIA Conformance</i> (and all other <i>TIA Conformance</i> sections throughout the document): a. We recommend removal of the reference to TIA.102-CABA and its test cases to simplify the document. The references to the P25-CAB-CAI_TEST_REQ document are sufficient to describe exactly what testing is required, as the P25-CAB-CAI_TEST_REQ makes the proper references to the TIA document, rendering the TIA references unnecessary and redundant.</p>	<p>The P25 CAP AP and OIC prefer to keep references to TIA-102.CABA in the document to show linkage between TIA and P25 CAP documentation.</p>
15	<p>Sections 2.3.3, 3.1.3 and 3.2.3: a. Unlike the other <i>TIA Conformance</i> sections, section 2.3.3 references TIA.102-BAAC-C. Presumably, this is because the feature in section 2.3 deals with subscriber handling of NAC values which are reserved within the P25 CAI standard. If so, for consistency, we recommend a similar approach for sections 3.1.3 and 3.2.3, which also deal with (base station) handling of reserved values.</p>	<p>The one TIA-102.BAAC-D mention was removed and replaced with <i>TIA-102.BAAD-B Conventional Procedures</i>. In <i>TIA-102.CABA Interoperability Testing for Voice Operation in Conventional Systems</i>, ‘Table 8 - Conventional Features Traceability Matrix’ [page 14] provides traceability between the conventional procedures document and the conventional interoperability test cases defined in TIA-102.CABA. The details in Table 8 were used to update all the ‘TIA Conformance’ paragraphs throughout the document.</p>