

## **FCC ERIC Forum - March 2, 2010**

I am Chief Harlin McEwen, Chairman of the Public Safety Spectrum Trust and Chairman of the Communications & Technology Committee of the International Association of Chiefs of Police.

I speak today on behalf of the Public Safety Spectrum Trust, the nationwide 700 MHz Public Safety Broadband Licensee. The PSST has long supported all efforts that will lead to the expeditious deployment of a nationwide, interoperable wireless broadband network for public safety. The PSST has worked closely with all public safety groups to establish a collaborative process and a consensus position on these issues to better advance our common goals.

We welcome the opportunity to work with the FCC on the ERIC proposal in order to enhance these efforts to best meet public safety's critical needs.

The ERIC proposal does raise some difficult questions and concerns, however, which we hope do not become impediments to public safety's urgent need for the long-awaited interoperable wireless broadband network.

The PSST questions whether ERIC might be taking on a broader mission than necessary. Given how long we have waited, we fear any efforts that may further complicate our goal of bringing robust and reliable broadband services to the public safety community.

In addition, we question whether the proposed ERIC framework may create some duplicative activities and responsibilities that could inadvertently hinder the development of wireless broadband services that meet public safety's needs.

For example, do the new ERIC boards and committees have missions that overlap substantially with existing, active organizations? Notably we are concerned that the proposed Public Safety Advisory Board, which the FCC says will be "broadly representative of the public safety community", will be drawing on the limited volunteer resources of the PSST, the National Public Safety Telecommunications Council and the SAFECOM Executive Committee?

Do some of the proposed responsibilities for ERIC duplicate efforts that have already been addressed by public safety and industry members, including interoperability frameworks, technical standards, roaming, and priority service? Such efforts have already been submitted for the record. Does the current proposal undo years of preparation and essentially start from scratch?

Finally, while the PSST supports and encourages the FCC to work with other federal government agencies to expedite network deployment, would additional layers of interagency involvement create new challenges and impediments? Would the proposed ERIC structure impose new bureaucratic federal requirements as each agency seeks to play a role? Do DHS, NIST, NTIA, DOJ, and other federal agencies – with their own federal spectrum resources – share the same sense of urgency as state and local public safety agencies in deploying this network?

The PSST appreciates the opportunity to participate in this forum and hopes to work closely with the FCC to address the questions raised today. We need to do this right, but we need to start down the path with a streamlined, efficient operation and as quickly as possible.