Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Recommendations of the Independent Panel Reviewing the Impact of Hurricane Katrina on Communications Networks	)	EB Docket No. 06-119
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	)	

COMMENTS OF THE NATIONAL PUBLIC SAFETY TELECOMMUNICATIONS COUNCIL

The National Public Safety Telecommunications Council (NPSTC) submits these comments in response to the Commission's Notice of Proposed Rulemaking (NPRM) in the above proceeding. The NPRM addresses the recommendations of the Commission's Independent Panel Reviewing the Impact of Hurricane Katrina on Communications Networks (Independent Panel). The Independent Panel's important work indicates several areas where emergency response can be enhanced. These areas involve matters within the Commission's specific authority and where its leadership, as the regulator of local and state wireless communications, is critical.

NPSTC agrees that pre-positioning equipment is a vital element of emergency response and must include all public safety frequency bands, including the much relied upon VHF band. To be effective, pre-positioning encompasses testing, maintaining, transporting the equipment, and ensuring that it is operated by trained individuals. Pre-positioning is an integral part of the planning, management, training and overall preparedness necessary to meet the exigencies of a disaster.

NPSTC also believes that several matters in pending proceedings respond to the Independent Panel's recommendations and can be pursued expeditiously. These matters address establishing a common nomenclature for interoperability channels, using currently designated 700 MHz reserved voice channels for portable trunked systems, establishing spectrum sharing test beds between local and federal public safety systems, allowing use by public safety agencies of 900 MHz frequencies for paging operations and extending the Emergency Alert System (EAS) to local areas. NPSTC also urges the Commission to pursue a leadership role in more general matters, particularly in the area of resources, so that the challenges the report ably presents can be met.

NPSTC believes that the Independent Panel's report and recommendation demonstrate how fragile public safety communications are in many places around the country and support the overall need to improve redundancy and diversity of its networks. NPSTC believes that a proposal to use the yet-to-be auctioned segments of 700 MHz to develop a nationwide public safety broadband network is meritorious and urges the Commission to commence an examination of that proposal.

The National Public Safety Telecommunications Council

NPSTC serves as a resource and advocate for public safety organizations in the United States on matters relating to public safety communications. NPSTC is a federation of public safety organizations dedicated to encourage and facilitate through a collective voice the implementation of the Public Safety Wireless Committee (PSWAC) and the 700 MHz Public Safety National Coordination Committee (NCC) recommendations. NPSTC explores technologies and public policy involving public safety agencies, analyzes the ramifications of particular issues, and submits comments to

governmental bodies with the objective of furthering public safety communications worldwide. NPSTC serves as a standing forum for the exchange of ideas and information for effective public safety telecommunications. The following thirteen organizations participate in NPSTC:

American Association of State Highway and Transportation Officials

American Radio Relay League

American Red Cross

Association of Fish and Wildlife Agencies

Association of Public-Safety Communications Officials-International

Forestry Conservation Communications Association

International Association of Chiefs of Police

International Association of Emergency Managers

International Association of Fire Chiefs

International Municipal Signal Association

National Association of State Emergency Medical Services Officials

National Association of State Telecommunications Directors

National Association of State Foresters

Several federal agencies are liaison members of NPSTC. These include the Department of Agriculture, Department of Homeland Security (SAFECOM Program and the Federal Emergency Management Agency), Department of Commerce (National Telecommunications and Information Administration), and Department of the Interior and the Department of Justice (National Institute of Justice, Office of Science and Technology – CommTech Program).

Background

The Commission's NPRM and the Independent Panel's report recognize that Hurricane Katrina was more than a disaster; it was a catastrophe. Also recognized is public safety communications' historic reliance on Commission licensed land mobile radio systems, with ancillary and supplemental services commercially provided. Redundant and diverse communication capability, significantly above that of commercial services, is the standard from which any effort to make improvements must define and commit to. Hurricane Katrina demonstrated how fragile many systems are. The NPRM and the Independent Panel's report address ways to fulfill the responsibility of meeting this objective.

NPSTC believes that there are three fundamental priorities that should guide the Commission's work. The first is that each public safety entity must have reliable agency specific voice communications. The second is reliable interagency voice communications or interoperability. The third is reliable data communications such as secure text messaging, transmission of documents, photographs, diagrams and streaming video. Dependable voice communications remains the foundation of effective emergency response for the everyday incident and the catastrophic incident. NPSTC believes that fulfilling these demands is not only a measure of the Commission's technical and regulatory rules, but requires the presence of adequate financial and spectrum resources.

The Independent Panel's recommendations comprehend that reliable communications are contingent on adequate power, infrastructure, radio channels and the strength of connecting networks and the presence of these elements in redundant and diverse formats. NPSTC urges the Commission to parallel the report's comprehension

that public safety communications must not only be built upon the presumption of potential defaults and a capability to circumvent or remedy failures immediately. The standard encompasses affording public safety agencies the opportunity, through training and access to information, to pursue short- and long-term deployment solutions. Underlying any sincere effort to meet the standard the Independent Panel embraces and to avoid future disasters with Katrina's terrible consequences is the responsibility to provide the resources required.

The Commission's Opportunity to Improve Public Safety Communications

The Independent Panel's analysis and recommendations provide insight and substantiation of the enormous challenges public safety communications face. Highlighted by the September 11, 2001 attacks and the ruin of Hurricane Katrina, much study and review has preceded and followed these tragic events. The Congress, Administration, Commission and local and state governments have directed considerable effort and investment toward making improvements. NPSTC and other organizations have committed much time in examining how effective communications can be available at the every day and large-scale incident. The pervasive challenge is providing modern efficient communications to local agencies and, in circumstances where the number of agencies and resources must expand considerably and expeditiously, to provide parallel expansion of communications capability.

These efforts have recognized that public safety communications operate in several disparate frequency bands and spectrum and financial resources are limited yet demands and requirements are expanding. NPSTC continues to be a strong advocate for improving (updating or replacing) traditional licensed public safety land mobile voice

communications systems so mission critical voice communications are always reliable for everyday needs and events as well as extraordinary events such as disasters or catastrophes. At the same time, new concepts and 3G (Third Generation) and 4G (Fourth Generation) technologies are emerging that need to be carefully examined.

The yet to be auctioned 700 MHz band provides this opportunity and a proposal to develop a nationwide public safety broadband network has been submitted to the Commission by Cyren Call Communications. NPSTC, at this time, does not endorse, or reject the Cyren Call proposal, but does believe the potential benefits to public safety are substantial and that constructive public discussion would be worthwhile. Cyren Call proposes to improve significantly public safety's wireless access to data such as text messages, photos, maps, and video while at the same time provide redundancy and back up to traditional land mobile systems and also provide nationwide voice and data interoperability. The proposal states that public safety will be the primary user and afforded priority over other services. There would be a unitary platform from which agencies and manufacturers can invest.[1] The Independent Panel's report and recommendation provides a sound premise from which the Commission can commence an examination of this important proposal.

Pre-Positioning Equipment and Interoperability

The report recommends that the Commission encourage state and local jurisdictions to retain and maintain, including arrangements with the private sector, a

[1] *Petition for Rulemaking* filed by Cyren Call Communications, Reallocation of 30 MHz of 700 MHz Spectrum (747-762/777-792 MHz) from Commercial Use/Assignment of 30 MHz of 700 MHz Spectrum (747-762/777-792 MHz) to the Public Safety Broadband Trust for Deployment of a Shared Public Safety/Commercial Next Generation Wireless Network (April 27, 2006).

cache of equipment components that would be needed to restore existing public safety communications within hours of a disaster. The recommendation is sound.

The Independent Panel recognizes that pre-positioning assets extends beyond the 700 MHz or 800 MHz bands. A large portion of public safety agencies continue to rely on the VHF band for daily operations, particularly in rural areas. Numerous major metropolitan areas rely on the UHF band. As federal agencies do not have access to bands above 420 MHz and have not been allocated channels in the 700 MHz band, the importance of pre-positioning equipment consistent with that used in a particular area is crucial. Concepts such as mandating through Commission rule or grant requirements the purchase of dual band 700/800 MHz radios will serve no purpose if the intended responding agencies do not use these frequency bands. For pre-positioned communications equipment to accomplish the objective of assisting response operations, it must parallel the communications resources used by local and state agencies in the disaster area.

Pre-positioning communications assets also entails planning, training and comprehending the scenarios where the equipment will be used. Equipment must be routinely tested and maintained. It must be located where it can be secured yet can be readily accessible so that it can be transported to the areas. NPSTC believes that the most effective models exist where equipment is placed at a military/National Guard facility or with a local agency(s) such as the DHS Prepositioned Equipment Program (PEP). Not only are such facilities generally part of local, state and federal emergency preparedness planning, but the ability to transport the equipment to the disaster area so that it can be deployed must be immediately available.

Similarly, pre-positioning must be built around the interoperability channels already designated and included in each of the spectrum bands. Successful interoperability models result from extensive planning that enable responders to implement protocols and commence communications immediately instead of arriving at an incident only to commence inquiries to determine what channels are available. There is significant experience in wild land fire operations in the West, particularly in California, where interoperability channels primarily encompass the VHF band. Notably, wild land fire response operations evolve around and depend upon VHF and some UHF channels to the exclusion of other bands. For example, in Montana there are less than ten agencies in the state using the 800 MHz band; reliance on the VHF band is almost universal. Implementing the Independent Panel's recommendations regarding pre-positioning will involve all the radio bands assigned to the public safety service and comprehension that specific bands are prevalent in particular geographic areas and emergency services. There is also the reality that the number of interoperability channels is far less than the demand.

Pre-positioning will not become a reality without resources. As noted, coordinating interoperability demands attention to detail and involvement by a range of agencies. Resources are necessary to arrange how and what equipment should be pre deployed and how it can be maintained so it is ready when needed. A means to transport the equipment must be available as well as the expertise to operate it. This is but one area where the Commission's leadership is as important as the exercise of its regulatory authority. Successful models such as the National Interagency Fire Cache maintained at Boise, Idaho should be followed. By articulating the standard and details needed to

provide reliable public safety communications, the Commission brings clarity to what diversity and redundancy means. It will afford the resource/appropriation process the opportunity to make meaningful decisions.

Notably, several Federal agencies (primarily the Department of Defense and Department of Homeland Security) maintain airborne platforms with significant communications capabilities. These platforms should be enhanced with a minimum of local and state interoperability channels (primarily repeaters) that could be immediately deployed in a coordinated fashion to, at minimum, provide command-level interoperability across a wide area to include the capability to gateway between all of the resources on the platform. As these systems operate in the air, they would represent the fastest possible deployment of "temporary infrastructure" to a disaster site. However, significant coordination would be required to ensure that operable systems were not disrupted due to the wide coverage from high altitude transmitters.

In additional to pursuing such actions as affording public safety access to the 700 MHz as soon as possible, NPSTC thinks the objective of pre-positioning assets and the underlying premise that redundancy and diversity have real meaning would be served by the Commission addressing matters presented in several pending proceedings.

Common Nomenclature

NPSTC reiterates its position, and that of the Commission's National Coordination Committee (NCC), that a common nomenclature for interoperability channels for public safety agencies be required. The Commission has previously rejected this proposal. NPSTC understands and shares the concern of the Commission that its rules not intrude on the operational and cultural environment of the thousands of state and

local agencies and that it not exceed its own operational expertise.[2] NPSTC suggests that immediate communications capability at an incident is so critical and the lack of a common nomenclature is such a significant impediment, that the Commission's reluctance should be overcome. With the 700 MHz band still awaiting the 2009 transition date and the ongoing 800 MHz reconfiguration and narrowbanding below 512 MHz, disruption will be limited while making communications assets more readily available.

NPSTC sincerely believes that a common nomenclature will make a tangible difference. It will perceptively reduce the initial confusion at an incident and more readily serve the purpose of these channels in environments where outside agencies respond. The uncertainty generated because there is no common naming protocol is not only a circumstance that must be corrected, but it must be corrected before an incident occurs because it is only then that it is revealed. What often results is communications assets deployed to an area cannot immediately be used, if at all. Instead of increasing redundancy and diversity, the lack of a common nomenclature lowers it. Failing to establish a common nomenclature is a failure to plan.

When the enormous resources were dispatched to the Gulf Coast, responding agencies accompanied by their own communications equipment were only able to communicate with the agency's own officers. Hurricane Katrina was not the first time where the lack of a clear comprehension of what channels are designated for interoperability/mutual aid impeded operations, as noted by both the Public Safety

[2] In the Matter of the Development of Operational, Technical and Spectrum Requirements for Meeting Federal, State and Local Public Safety Communications Requirements Through the Year 2010, *Fifth Memorandum Opinion and Order, Sixth Report and Order, and Seventh Notice of Proposed Rulemaking,* 20 FCC Rcd 831, FCC 05-9, WT Docket 96-86 (January 7, 2005).

Wireless Advisory Committee and the National Coordination Committee. Without a common nomenclature, it will not be the last.

Similarly, a protocol for Continuous Tone Coded Squelch System (CTCSS) tones will promote interoperable communications at a disaster scene. CTCSS is a means by which received signals are authenticated or validated and access provided. CTCSS is used in the crowded Commercial and Public Safety Land Mobile Service to keep users of one repeater from accessing other repeaters that may be operating on the same frequency, often in the same locale or metropolitan area. The CTCSS tone allows users to select a particular repeater when multiple repeaters serve the same area and are transmitting on the same frequency. Without a consistent protocol users that encounter accessing two or more repeaters operating on the same frequency face significant disruption. Consistent CTCSS tones will minimize the reception of disruptive signals from multiple repeaters in a disaster area.

The current Commission designated interoperability and intersystem channels suffer from a nationwide lack of cohesiveness and coordination that inhibits consistent public safety interoperability across all the Commission's public safety bands. What results is disruption and delay. The representative national user organizations have recommended a centralized interoperability format emphasizes the benefit to be gained and the untenable current circumstances. NPSTC urges the Commission to mandate the use of a standard channel nomenclature and coordinated CTCSS tones for interoperability communications across all bands.

700 MHz Reserve Channels

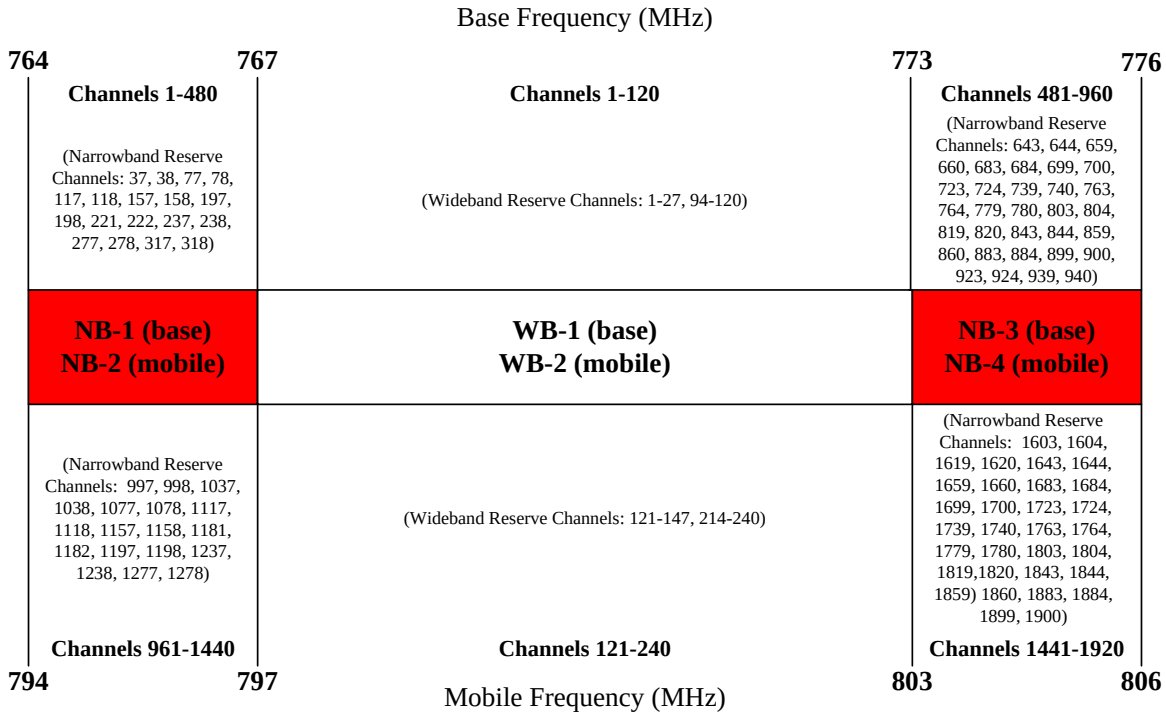
When the Commission established the 700 MHz band plan for public safety communications, it held in reserve 96 narrowband voice channels.[3] The Commission stated that for the public safety radio service, where market incentives do not apply, it was prudent to hold some spectrum in reserve to accommodate future requirements that are unforeseen at this time.[4] NPSTC believes that the objective of pre-positioning assets will be promoted by authorizing a portion of these currently designated narrowband reserve voice channels in the 700 MHz band to be used in such circumstances.

[3] Section 90.531(b)(2) of the Commission's rule states: Narrowband reserve channels. The following narrowband channels are undesignated and reserved: 37, 38, 77, 78, 117, 118, 157, 158, 197, 198, 221, 222, 237, 238, 277, 278, 317, 318, 643, 644, 659, 660, 683, 684, 699, 700, 723, 724, 739, 740, 763, 764, 779, 780, 803, 804, 819, 820, 843, 844, 859, 860, 883, 884, 899, 900, 923, 924, 939, 940, 997, 998, 1037, 1038, 1077, 1078, 1117, 1118, 1157, 1158, 1181, 1182, 1197, 1198, 1237, 1238, 1277, 1278, 1603, 1604, 1619, 1620, 1643, 1644, 1659, 1660, 1683, 1684, 1699, 1700, 1723, 1724, 1739, 1740, 1763, 1764, 1779, 1780, 1803, 1804, 1819,1820, 1843, 1844, 1859, 1860, 1883, 1884, 1899, 1900.

[4] In the Matter of the Development of Operational, Technical and Spectrum Requirements for Meeting Federal, State and Local Public Safety Agency Communications Requirements Through the Year 2010, WT Docket 96-86, FCC 00-348, *Third Memorandum Opinion and Order and Third Report and Order* at paragraph (October 10, 2000); *Fourth Report and Order and Fifth Notice of Proposed Rulemaking,* FCC 01-10 (January 17, 2001)

The 700 MHz Public Safety Band is structured as follows:

The 700 MHz Public Safety Band
Current Plan



NB = Narrowband Segments
WB = Wideband Segments

NPSTC recommends that the Commission assign 24 12 ½ kHz voice channel pairs that would be limited to disaster augmentation for large-scale events and disasters. These frequencies would be drawn from the 700 MHz band's 96 narrowband voice channels currently designated as reserved. The channels will provide core communications capability for major events; disaster response and recovery efforts will

be particularly effective where infrastructure is non-existent, insufficient and/or has been destroyed and there is need to regain wireless voice communications.[5]

Portable systems on wheels capable of 700 MHz operations in a disaster zone would be pre-positioned, transported to the area and deployed. Experience with systems of this type deployed by local agencies in the 800 MHz band has demonstrated that these units can provide the equipment, technical expertise, backup power and other requirements in the place of permanent infrastructure.[6] In addition to prepositoned resources, public safety agencies would be encouraged to add these systems to their local resources to serve the same purpose. As all of these operations would be adjacent to the 700 MHz interoperability channels, the transmitting facilities transported into and engaged in the disaster zone will comport with the equipment manufactured for the band, representing a critical efficiency gained from the 700 MHz public safety band. This capability to restore communications will be integrated into the band's interoperability and technical platforms.

The 24 700 MHz reserve voice channels can serve to increase redundancy and diversity and enable restoration of communications expeditiously. NPSTC believes that these reserve 700 MHz voice channels will enhance the effectiveness of disaster response. The Statewide Interoperability Executive Committees (SIECs) are in a unique position to facilitate effective use. We think that the SIEC structure can best develop a

[5] The Commission's pending proceeding addressing the structure of the 700 MHz public safety segment for wideband and broadband operations, WT Docket 96-86, can serve as a vehicle to examine using these currently designated narrowband reserve voice channels in such a way.

[6] For example, San Bernardino County, California operates a 5-channel 800 MHz deployable trunked system that has provided invaluable support at major events and disasters, as well as during periods of infrastructure failure. The Denver Police Department, through a DOJ COPs grant, has added a 5-channel 800 MHz trunking system to its recently deployed interoperability vehicle that is available as a shared resource to all public safety agencies in the region.

management plan to promote use of these channels which, to make them usable, must be coordinated with regard to the trunking systems, and the trunking systems placed in a usable fashion in most, if not all, user agency radios.

Sharing

In the Commission's and the National Telecommunications Information Administration (NTIA) proceedings addressing spectrum sharing test beds between federal and non federal users, NPSTC urged both agencies to examine sharing opportunities where users exist in an environment of similar purpose. Technical parameters will be best understood so that the compatibility of uses can be better evaluated. Importantly both sectors have a stake in the success of the initiative. NPSTC recommended that the VHF and UHF bands present tangible opportunity for spectrum sharing as there are numerous local, state and federal agencies that rely on these bands for core public safety communications.

Disaster preparedness and response, where local, state and federal agencies coordinate operations, is an optimal opportunity for spectrum sharing.[7] The prominence of radio operations in the VHF and UHF bands by both federal, local and state agencies, particularly where agencies are in the same geographic area and have mutual aid relationships, exemplifies not only the technical compatibility but a collective purpose that will make spectrum sharing a reality.

Paging Remains a Vital Public Safety Resource

The Independent Panel notes that paging systems appear more reliable in some instances than voice/cellular systems as its infrastructure relies on satellite networks

[7] See Comments of the National Public Safety Telecommunications Council, *In the Matter of Creation of a Spectrum Sharing Innovative Test-Bed*, ET Docket No. 06-89 (July 10, 2006).

rather than terrestrial systems. Paging also allows messages to be relayed if a transmitter defaults. Additionally, because of the propagation character of the spectrum used, building penetration is generally favorable. These factors and that it presents an extremely cost efficient means to communicate with a number of individuals, reflects why paging remains a key public safety communications resource.

NPSTC reiterates its prior recommendation to the Commission that the Industrial and Business (B/I) pools in the 896-901/935-940 MHz bands be available to public safety agencies to use for paging systems.[8] Public agencies are examining digital one and two way paging ability to support dispatch operations. Digital paging systems can incorporate computer-based automated dispatching capabilities that increase the timeliness and accuracy of dispatch functions. In circumstances where other modes are either overloaded or in default, paging serves as a credible facility to deliver information. Public safety access to the 896-901/935-940 MHz bands would promote the Independent Panel's recommendation.

Extension of EAS to Local Government is Crucial

NPSTC concurs with the Independent Panel that the Emergency Alert System (EAS) must be enhanced at the state, county and local level for it to be a dependable resource in emergency circumstances. The current EAS system is not capable of providing timely and discrete information to localized sectors of the public and first responders so that reasoned decisions can be made in preparing and responding to an emergency. The tragedies of the Gulf Coast storms demonstrate the devastating impact that natural disasters have on the health and safety of many people in a particular state or

[8] Joint Comments of the Association of Public Safety Communications Officials, International and the National Public Safety Telecommunications Council, *In the Matter of the Spectrum Needs of Emergency Response Providers*, WT Docket 05-157 (April 28, 2005).

region and the crucial role state and local governments have in delivering alerts and warnings. There is a vital connection between state and local alerts and warnings and efforts to mitigate disasters.

The reality is that current local warning systems are inadequate in scope and effectiveness. In addition to failing to alert significant segments of the community, they also often alert people who do not need to be warned or protected. These twin failures undermine confidence in the message and the messenger. In other cases, alerting systems ignore what is known about human behavior and do not provide sufficient information to confirm the urgency, severity or probability of an event so that people can make reasonable decisions regarding recommendations made by local officials. Furthermore, the majority of current systems do not provide for the special needs of those who do not speak English or are disabled. [9]

The Independent Panel recognized, as has the Commission's proceedings and advisory committees, EAS' lack of operational effectiveness at the local level. NPSTC believes that the fundamental challenge is federal, state and local governments working together to make EAS a vital resource in emergency circumstances. The President's Executive Order of June 26, 2006 recognizes how limited the current system is.[10] The Executive Order directs the Department of Homeland Security, in coordination with the Commission and other agencies, to bring about a more effective EAS so that it can be an integral element of regional and local emergency response plans. Only by extensive

[9] Statement of Chief Robert DiPoli, City of Needham, Massachusetts Fire Department and President, International Association of Fire Chiefs (IAFC), on behalf of the IAFC, the National Sheriffs' Association, the International Association of Chiefs of Police and the Association of Public-Safety Communications Officials-International before the Media Security and Reliability Council (2004)

[10] Executive Order of the President, *Public Alert and Warning System* (June 26, 2006).

federal, state and local planning and coordination efforts will EAS become an effective instrument in emergency response.[11]

Diversity of Disasters and Topography

In the Commission's Public Notice of July 26, 2006[12], it inquired whether the Independent Panel's recommendations are broad enough to take into account the diverse topography of our nation, the susceptibility of a region to a particular type of disaster, and the multitude of communications capabilities a region may possess.

It is because of the diversity of communications resources that NPSTC urges the Independent Panel's recommendations comprehend the importance of tailoring response plans, including pre-positioning equipment, to the assets used within particular geographic areas. The pervasive use of the VHF band extends beyond rural areas and the prominence of the UHF band in numerous metropolitan areas requires that planning, preparation and training be directed to a range of particular environments. Similarly, the diversity of disasters and topography emphasize how crucial tangible plans and preparation are at the core of effective response.

Effective disaster response requires reliable communications. It demands planning among agencies, vendors and the public, an embrace by these agencies of a management plan, policies to govern implementing the plan, training and technology. All these efforts must be shaped to particular circumstances.[13]

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[11] Comments of the National Public Safety Telecommunications Council, In the Matter of Review of the Emergency Alert System, EB Docket No. 04-296 (January 23, 2006).

[12] In the Matter of the Recommendations of the Independent Panel Reviewing the Impact of Hurricane Katrina on Communications Networks; Notice of Proposed Rulemaking, *Public Notice*, DA 06-1524 (July 26, 2006)

[13] See Comments of the Tennessee Statewide Interoperability Executive, John Johnson, Coordinator, July 21, 2006 contained in Docket 06-119, responding to this NPRM.

Summary

Hurricane Katrina's catastrophic destruction of lives and property on the Gulf Coast wreaked havoc on the core ability to provide effective emergency response. The Commission's Independent Panel Reviewing the Impact of Hurricane Katrina on Communications Networks performed a commendable and important contribution in outlining the direction toward strengthening public safety communications. For emergency communications systems to be effective, redundancy and diversity must pervade. The fragile character of many of the nation's public safety systems can be remedied by committing planning, detail and resources. The yet-to-be auctioned portions of the 700 MHz band, as well as several matters pending before the Commission, provide an opportunity to enhance public safety communications and respond to the Independent Panel's report and recommendations. NPSTC commends the Commission for pursuing this review, urges that it take expeditious action and that it continue its leadership in pursuing robust public safety communications capability.

Respectfully submitted,

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