

December 15, 2021

Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: GN Docket No. 21-304, Petition for Emergency Relief of AICC

Dear Secretary Dortch,

As addressed more fully below, the National Public Safety Telecommunications Council submits this letter to support a reasonable extension of AT&T's 3G sunset, as requested by the Alarm Industry Communications Committee (AICC) in its May 10, 2021 Petition for Emergency Relief filed in the above referenced docket.¹ While both AICC and AT&T have provided valid reasons for their respective positions, NPSTC believes the safety issues involved warrant a reasonable extension of the 3G sunset date.

The National Public Safety Telecommunications Council (NPSTC) is a federation of public safety organizations whose mission is to improve public safety communications and interoperability through collaborative leadership. NPSTC pursues the role of resource and advocate for public safety organizations in the United States on matters relating to public safety

¹ The International Association of Fire Chiefs (IAFC) has abstained from voting on this filing.

telecommunications. Accordingly, NPSTC provides guidance on issues that can either negatively impact or benefit the operation of public safety communications.

The AICC has requested that the Commission require AT&T to extend its 3G service sunset date from February 22, 2022 to December 31, 2022. AICC has advised the Commission that due to COVID restrictions and supply chain shortages, its members have been unable to update alarm devices currently operating on AT&T 3G service in as timely a manner as originally planned.² Without an update, these alarm devices will discontinue operations when AT&T retires its 3G service, currently targeted for February 22, 2022.

In response AT&T has opposed extending the 3G sunset date, advising that it needs to repurpose 10 MHz of its spectrum in the 850 MHz band currently used for 3G to support 5G. AT&T stated that it needs to repurpose the 10 MHz of 3G spectrum so it can carry more 5G traffic at 850 MHz and can also provide an adequate uplink signal to support increased C-Band (3.7 GHz) downlink 5G coverage. AT&T also responds that escalating traffic demands will place increasingly severe strains on its 4G LTE network in 2022, and the transition to 5G is necessary to relieve that pressure.

NPSTC believes that both AICC and AT&T have set forth reasonable arguments from their own perspectives. Ideally, AICC and AT&T could reach some compromise that would meet each other's needs. However, should AICC and AT&T be unable to reach a voluntary agreement, NPSTC's greatest concern is the safety issues that will occur if the 3G sunset is not extended.

² AICC Petition for Emergency Relief, May 10, 2021, Summary section, page ii.

NPSTC's primary concern on this issue are remaining fire alarms, intrusion and security alarms and medical alert alarms that will not be able to communicate once the 3G service is retired. These alarms protect the safety of people and property and are essential tools for public safety fire, law enforcement and emergency medical responders.

The record in this proceeding also addresses the concerns that felons and drunk drivers currently being monitoring by ankle bracelets operating on AT&T's 3G technology will go untracked once the 3G service is retired. Alcohol Monitoring Systems, Inc. noted that

The Commission should vote swiftly to extend the 3G sunset, in order to prevent potentially tens of thousands of offenders ranging from sex offenders, child abusers, domestic violence offenders, gang members, drug dealers and drunk drivers from going unmonitored, and able to commit dangerous acts without detection.³

In addition, the record indicates that safe and effective transport of children on school busses will be impacted:

More than 100,000 school buses across the country still rely on 3G telematics for student tracking, student identification, vehicle maintenance safety, efficient logistical operations, and/or COVID-19 contact tracing efforts. And all are at risk of losing data services immediately when AT&T shuts off 3G service. The impact is exponentially worse since social distancing, driver shortages and pandemic safety requirements continue to cause extreme logistical headaches for school transportation directors. This loss of connectivity will be detrimental to the operations of school districts, and even more importantly, can impact student safety.⁴

NPSTC recommends the Commission use its influence to attempt achieving a compromise that serves the needs of both AICC/its members and AT&T. However, if such a voluntary compromise is unattainable, NPSTC believes the Commission must place a priority on the safety

³ Comments of Alcohol Monitoring Systems, Inc., August 30, 2021 at page 5.

⁴ Reply Comments of Zonar Systems, September 14, 2021, at page 6.

issues involved and require a reasonable extension of the AT&T 3G sunset currently planned for February 22, 2021. It is vital to ensure the 3G sunset does not put American lives at risk.

Ralph A. Haller, Chairman

A handwritten signature in black ink, appearing to read "Ralph A. Haller", with a long horizontal flourish extending to the right.

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