

January 25, 2006

Federal Communications Commission
Attn: Lisa M. Fowlkes
Enforcement Bureau, 7-C737
445 12th Street, SW
Washington, DC 20554

Dear Ms. Fowlkes:

The First Response Coalition (FRC) is pleased to offer its comments on first responder communications interoperability in advance of the Commission's January 30, 2006 Advisory Committee meeting regarding the impact of Hurricane Katrina on telecommunications and media infrastructure. The FRC applauds this effort and looks forward to hearing the testimony and debate at the meeting and discussing these critical issues with Committee members and Commission staff. It is imperative that this meeting lead to substantive policy actions that will help first responders across the country achieve interoperable communications before another disaster occurs.

The mission of the FRC is to educate the public on the needs of our first responders and to ensure that policymakers attach a high priority to public safety issues such as funding, research, training, equipment, standards development, spectrum allocation and management. In addition, the FRC supports greater coordination at all levels of government to achieve seamless interoperability, which will allow emergency personnel to coordinate an effective response to local, regional, and national emergencies.

The First Response Coalition urges the FCC to use the upcoming Advisory Committee meeting as a first step in solving the critically important problem of first responder communications interoperability. The most immediate step in solving the interoperability crisis is to reallocate spectrum in the 700 MHz band from television broadcasters to first responders as part of the digital television (DTV) transition. Following the reallocation, the remaining 700 MHz spectrum would be auctioned, which will generate \$10 billion, according to the Congressional Budget Office. The Commission should support the immediate appropriation of a portion of the funds from the auction to first responders so that they may acquire the communications equipment they need to provide an effective emergency response.

As was tragically evident on September 11, 2001, and again in the wake of Hurricane Katrina, the communications systems of public safety departments are not interoperable. In New York, for example, over 100 firefighters perished in the collapse of the second World Trade Center tower because fire department radios were unable to receive the evacuation order issued over police radios. In New Orleans, the local police and fire

departments utilized a system made by one manufacturer (Tyco International Ltd.), while the Louisiana State police operate on a completely different platform (Motorola, Inc.). The communications problems experienced by these agencies in the storm's aftermath were further compounded by the diverse and uncoordinated radio systems in use by other public safety departments responding from across the nation to the affected area.

Throughout the country it is difficult, if not impossible, for different departments from different jurisdictions to communicate because their systems and equipment are unable to interface with one another. In fact, many agencies operating within the same jurisdiction are often unable to coordinate an effective emergency response because members of the first responder community operate on different frequencies. In spite of the widespread media attention first responder communications problems received following the 2001 terror attacks and again after Hurricane Katrina, the promises made by policymakers to address the problem have gone unfulfilled.

Attached to these comments is the FRC's December 2005 white paper, "**A Failure to Communicate: A Stock-take of Government Inaction to Address Communications Interoperability Failures Following Hurricane Katrina,**" which outlines how policymakers have not yet delivered the resources promised to first responders. The report can also be found on the FRC's website at www.firstresponsecoalition.org. Despite several recent national disasters and repeated promises from policymakers to help first responders, the FRC found that little progress has been made to pass interoperability legislation. Public safety departments across the country still have not been provided with the funding necessary to purchase the advanced technology that is needed to solve the communications and interoperability crisis.

On behalf of the citizens, first responders, and community organizations that comprise the First Response Coalition, thank you for your consideration of our views. We look forward to working with you in the future to provide communications solutions for our nation's first responders.

Regards,

Steven C. Jones
Executive Director, First Response Coalition