

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

PUBLIC FORUM ON PROPOSAL TO CREATE AN EMERGENCY RESPONSE
INTEROPERABILITY CENTER
March 2, 2010

Statement of
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ASSOCIATION OF PUBLIC-SAFETY COMMUNICATIONS OFFICIALS-
INTERNATIONAL (APCO)

My name is William Carrow, and I am the president-elect of APCO International, the nation's oldest and largest public safety communications organization. APCO's over 15,000 members are at the frontlines of providing communications capability for our nation's first responders. We have long advocated steps to improve interoperability among public safety communications systems, through digital equipment standards such as Project 25, spectrum allocations to facilitate multi-agency shared systems, funding to support interoperability solutions, and improved governance and planning across local, state, tribal and federal agencies.

APCO applauds the Commission for proposing the creation of an Emergency Response Interoperability Center, or "ERIC," though many important issues regarding ERIC must still be resolved. An entity to address interoperability will be essential as we move into a broadband environment where local public safety systems, national public safety networks, and commercial networks will need to interoperate to provide optimum broadband communications for our nation's first responders. A wide variety of network engineering standards, roaming agreements, priority access procedures, equipment standards and other interoperability protocols will be needed.

ERIC could play an important role in addressing these issues. However, we believe that there are several critical elements for ERIC to be a success.

First, there must be sufficient funding to ensure that ERIC is able to fulfill its responsibilities in an effective and efficient manner.

Second, ERIC must be responsive to local public safety needs. Therefore, there must be an effective advisory body to ERIC that includes direct representation from first responder leadership associations, organizations such as APCO, and representatives from a variety of public safety interests, including large, medium and small agencies, urban and rural areas, and diverse regions of the nation. Critical infrastructure industries, such as utilities, should also be involved.

Third, we believe that ERIC should be a part of the FCC, as the Commission has direct jurisdiction over state and local government spectrum allocation and management. However,

there should also be close cooperation and participation by DHS, NTIA, NIST and other relevant federal agencies.

Fourth, ERIC will need to work closely with the Public Safety Spectrum Trust, the national licensee of the public safety broadband spectrum. Currently there is little information about the specific roles and responsibilities of ERIC and how that aligns with the roles and responsibility of the PSST. We encourage the Commission to address the role of PSST and its relationship with ERIC as earlier as possible.

Fifth, there is uncertainty regarding the scope, authority and interaction of ERIC with local, state, tribal and federal stakeholders. We encourage the Commission to address this issue in a clear and uniform manner as early as possible.

APCO looks forward to participating in ERIC and working with the Commission to enhance public safety communications capability. We also continue to urge that Congress reallocate the D block, as we believe that would be the most effective way to address the long term broadband needs of public safety. In any event, ERIC could play a critical role in ensuring that public safety broadband communications will be available to the maximum number of users possible with seamless interoperability.

On behalf of APCO and its nationwide membership, thank you for the opportunity to submit these remarks.