



June 6, 2007

Marilyn Ward, Executive Director
National Public Safety Telecommunications Council
8191 Southpark Lane, Unit 205
Littleton, CO 80120

Mrs Ward:

The California Statewide Interoperability Executive Committee (CalSIEC) is composed of public safety representatives from local, county, tribal and state agencies across California. It also includes public safety representatives from associations, 700 and 800 MHz Regional Planning Committees, special districts and universities, as well as public safety support representation from critical infrastructure providers and the California National Guard. It represents this nation's largest state from its dense population centers to its most remote mountainous regions.

It is our privilege to congratulate NPSTC on an important effort to seek public comment on the FCC's 700 MHz National Coordination Committee's Interoperability Channel Naming proposal, arrive at an acceptable compromise during an amazing show of consensus building at a meeting in Orlando on February 5, 2007 and then publicly vet the final report of that meeting during the intervening months. As you know, the California Fire Services sent a delegation to the Orlando meeting and participated actively in building the consensus naming proposal. A member of CalSIEC representing the FIRESCOPE Communications Specialist Group, Brent Finster, offered the following formal comment to NPSTC on the consensus report:

"FCSG/CalChiefs believes that the process as conducted by NPSTC was a fair, equitable process that allowed for a maximum amount of vetting by the public safety agencies that will be most affected by this decision. FCSG/CalChiefs submitted a proposal and were in attendance at the Channel Naming Task Force meeting in Orlando. We saw a great deal of cooperation and collaboration during that meeting and an understanding on the part of the committee as to our specific issues and concerns. FCSG/CalChiefs believes that any radio channel naming plan adopted should address the end users' needs primarily. We feel that our comments were heard and understood. At the conclusion of the day, we reviewed the consensus. Although FCSG/CalChiefs was not successful in all of the aspects of our submission, we feel that we achieved 95% of what we set out to accomplish. FCSG/CalChiefs understands the diversity of interests in this issue, both geographically as well as the various levels of experience regarding the usage of interoperability channels within this country. We believe that California, and especially the California Fire Service, has the most experience in regards to the actual use of mutual aid/interoperability channels based on our activity and the sophistication of our systems and processes."

The California Fire Service went beyond a paper review of the proposal and actually programmed a variety of radios and field tested the new nomenclature, something we do not believe was done by any other party. Based on the consensus agreement reached in Orlando and the actual field tests by first responders, CalSIEC offers its full support to the consensus NPSTC Channel Naming Task Group Report of Committee published following the Orlando meeting.



Governors Office of Emergency Services
Telecommunications Branch - Interoperability Programs Unit
916-845-8630 www.calsiec.org

June 6, 2007

National Public Safety Telecommunications Council
Page 2

Finally, CalSIEC notes that a number of the initially proposed modifications, as well as comments offered during the recent vetting process, originated within managerial and technical components of public safety agencies. We are concerned that significant weight might be given to comments from public safety support staff who do not now, nor may ever have, actually worked as a first responder in the field. Beyond the constraints placed upon all areas of public safety with regard to training (or retraining where different naming has been used in the past), once the technical discussions around radio programming and those of cost were addressed in detail and generally resolved by NPSTC, this became wholly an operational issue. Thus, NPSTC's final decision must be based on what is best from an operational perspective. Is the proposal workable and are the names understandable and usable by first responders actually working on day-to-day incidents, as well as the many major emergencies that strike our nation all too often? California's field trials of the consensus proposal tell us it is the right one. Thus, we strongly urge you to move forward not only with its adoption by NPSTC as a consensus standard, but bringing it back to the FCC for enactment into Part 90 of their Rules & Regulations as a requirement for use of the nationally designated interoperability channels covered by the proposal according to the time frame, and with the stipulations, proposed in the NPSTC Report of Committee. Once adopted by NPSTC it must be widely circulated, including to all parties involved in 800 MHz rebanding since this is the most time sensitive of the no-cost programming opportunities for implementing the new names.

For decades, almost every after-action report following a major incident, be it a California wildfire, the 9/11 Terrorist Attacks, or Hurricane Katrina, has highlighted a lack of standard names for interoperability channels as a major impediment to effective use of public safety communications by responding agencies, often coming from hundreds or thousands of miles away. NPSTC has afforded the national first responder community an opportunity to use the current momentum for improving interoperability and resolve the single most pressing and long-standing operational detriment to effective interagency communications that exists. We all must seize this moment and use it to our collective benefit.

Sincerely,

Robert N. Sedita, Commander
Los Angeles County Sheriff's Department
Vice-Chair, California Statewide Interoperability Executive Committee