

National Emergency Number Association
*The Voice of 9-1-1*TM



Marilyn Ward, Executive Director
National Public Safety Telecommunication Council

September 17, 2009

RE: Comments on the *NPSTC 700 MHz Public Safety Broadband Task Force Report and Recommendations*

Hello Marilyn,

Per your request, I am writing to express some thoughts regarding the reference report. I understand that this letter will accompany the Report as it is sent to the PSST. Thank you for this opportunity.

First, I want to congratulate the Chair and Co-Chairs of the groups contributing to this report. I recognize the tremendous amount of time and effort that went into preparing this Report. It is noted that the NPSTC's Governing Board voted to form a 700 MHz Broadband Task Force. The Task Force was formed and given the "mission to develop the minimum recommendations necessary to ensure roaming and interoperability among localities and regions that have submitted waivers to the Federal Communications Commission (FCC) to build out 700 MHz broadband networks ahead of a nationwide network." (page 1 of the Executive Summary). NENA recognizes the excellent work contained in the Report addressing the specific issues of roaming and interoperability. NENA also recognizes the Report addresses the specific issue of the existing waivers by some to build networks prior to the FCC's decision on resolving the D Block public safety/commercial entity partnership. The Report recognizes that it likely will take many years to even approximate ubiquitous coverage (page 32). The Report also recognizes that the ability of public safety users to roam on commercial networks is essential and that the ability of commercial users to roam onto the public safety 700 MHz broadband network may be essential to rendering the public safety 700 MHz broadband network financially viable in much of the country (Page 32).

Also, the Report advocates the reallocation of the D Block. NENA believes that this is a policy matter and thus not pertinent to the mission of this Report – addressing roaming and interoperability.

NENA has presented options to the FCC to enable a national broadband network for public safety use in the 700 MHz band and has asked for funding assurances to provide access to

this network. NENA believes that as the PSST reviews this Report it must consider how this network will be funded on a recurring basis. Careful attention should be paid to the perception that public safety need for spectrum may be negated by the opportunity to lease excess capacity of this broadband network as mentioned in this Report.

Respectfully,

A handwritten signature in black ink, reading "Brian F. Fontes". The signature is written in a cursive style with a large, stylized initial "B".

Brian F. Fontes,
CEO