April 8, 2015

Federal Communications Commission

The National Public Safety Telecommunications Council 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 telecommunications. NPSTC has promoted implementation of the Public Safety Wireless Advisory Committee (PSWAC) and the 700 MHz Public Safety National Coordination Committee (NCC) recommendations.

NPSTC explores technologies and public policy involving public safety telecommunications, analyzes the ramifications of particular issues and submits comments to governmental bodies with the objective of furthering public safety telecommunications worldwide. NPSTC serves as a standing forum for the exchange of ideas and information for effective public safety telecommunications.

Chairman Wheeler's March 24, 2015 statement before the House Subcommittee on Financial Services and general Government Committee on Appropriations advised the following:

> *After analyzing a contractor report on field office use, we have determined that we can more efficiently deploy staff using a "tiger team" approach and make better use of regional offices. This plan, if accepted by my fellow commissioners, will lead to 16 field office closures and annual savings of $9 million without diminished productivity.*

NPSTC urges the Commissioners to consider very carefully whether closing 16 of its field office points of presence is the right approach. As public safety, commercial, and broadcast community constituents, we believe such closures would be an ill-advised rush to judgment which would negatively impact the public we all strive to serve.

- As taxpayers, we are sympathetic to the need for the Commission to reduce costs. However, as discussed below, it is difficult to believe that the Commission can close 16 (over 70%) of the current field offices without a negative impact to its public safety, commercial, and broadcast constituents, and the public they serve.

- As industry has also strived to reduce costs, an increasing number of employees work out of their homes. It is unclear whether having field engineers work out of their homes has been considered as

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an alternative to eradicating the field presence in 16 areas. It would appear that a home office approach could benefit the Commission's constituency and the public by maintaining the current field engineer presence while also significantly reducing costs.

- There has been no open opportunity for the public safety, broadcast, and commercial constituents who would be affected by field office closures to review the contractor's report and rationale so we can provide comments. This lack of transparency is inconsistent with normal Commission processes on many issues.

- We are concerned that while a $9M savings may sound positive on the surface, the contractor recommending this approach may not have taken into account practical issues affecting the ability of a "tiger team" to substitute for current local/regional field offices. For example:

    - If the notion is that a tiger team member could fly in, resolve harmful interference almost immediately, and fly back, the advice from the contractor may not be well-founded. We know from experience that harmful interference to public safety, commercial, or broadcast communications is not always from a constant signal. Sometimes harmful interference signals can be periodic, requiring a field engineer to investigate the situation over several days or longer.

    - Unlike engineers in current local/regional field offices, a tiger team member may lack local knowledge and/or relationships for a given area that would be helpful in interference resolution.

    - Such a reduction is likely to impact the Commission's ongoing ability to attract engineers with the skills needed to conduct interference investigations successfully.

- Industry and public safety agencies already dedicate our own resources to assist in interference mitigation. We have a positive relationship working with FCC field engineers to assist in those efforts, especially when the Commission's authority is needed to help resolve an issue.

- In summary, we again urge the Commissioners to consider very carefully whether closing 16 of its field office points of presence is the right approach. As public safety, commercial, and broadcast community constituents, we believe such closures would be an ill-advised rush to judgment which would negatively impact the public we all strive to serve.

Sincerely,

Ralph A. Haller, Chair
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