Public Safety Spectrum Trust

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Nationwide Public Safety Interoperable Wireless Broadband Network

Local, State, and Nationwide Governance and Funding Challenges

Federal Communications Commission
Public Safety & Homeland Security Bureau
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The Proposed Nationwide Public Safety Interoperable Wireless Broadband Network

Building a new Nationwide Public Safety Interoperable Wireless Broadband Network presents an opportunity to bring commercial technologies to the public safety community that will allow them access to much needed and reliable wireless data services.

The Vision of Public Safety

Government funding and commercial investment to build out, maintain and refresh the network

Public/Private Partnership(s) that will facilitate building a Nationwide Public Safety Interoperable Wireless Broadband Network

Network reliability, security, and coverage greater than currently provided by commercial carriers but giving public safety access to the latest commercial technologies

Priority access and adequate spectrum for public safety

A satellite component that will provide coverage when terrestrial service is disrupted or not available

June 6, 2007 - The Public Safety Spectrum Trust (PSST) was created as a not-for-profit Corporation. It was formed by the Association of Public-Safety Officials-International (APCO), the International Association of Chiefs of Police (IACP), the International Association of Fire Chiefs (IAFC), and the International Municipal Signal Association (IMSA). The intent was to apply for the proposed single nationwide Public Safety Broadband License

August 10, 2007 – FCC issued the Second Report & Order that set forth a process for selection of a nationwide public safety broadband license including rigorous requirements for eligibility for the nationwide license. The R&O included unprecedented requirements for a license holder including specific language to be included in the By-Laws of the organization holding the public safety license.

November 19, 2007 - FCC named the PSST as the nationwide Public Safety Broadband Licensee (PSBL) and issued a 10 year license.

The Public Safety Spectrum Trust (PSST) is currently governed by a voting board of fifteen members - one representative from each of the following organizations:

1. American Association of State Highway Transportation Officials (AASHTO)
2. American Hospital Association (AHA)
3. Association of Public-Safety Communications Officials-International (APCO)
4. Forestry Conservation Communications Association (FCCA)
5. International Association of Chiefs of Police (IACP)
6. International Association of Fire Chiefs (IAFC)
7. International City/County Management Association (ICMA)
8. International Municipal Signal Association (IMSA)
9. National Assn of State Emergency Medical Services Officials (NASEMSO)
10. National Assn of State 9-1-1 Administrators (NASNA)
11. National Emergency Management Association (NEMA)
12. National Emergency Number Association (NENA)
13. National Fraternal Order of Police (NFOP)
14. National Governors Association (NGA)
15. National Sheriffs' Association (NSA)

The King-Thompson bill suggests or possibly requires a PSBL Board of 40 organizations. The PSST is open to adding organizations but believes that decision should be the prerogative of the public safety community as opposed to Federal legislation or FCC Rules. It should be recognized that there will be increased costs and complexity involved in expanding the PSBL Board but it could be managed with appropriate funding.

The FCC has created the Emergency Response Interoperability Center (ERIC). ERIC is housed in the FCC Public Safety & Homeland Security Bureau (PSHSB). As proposed, ERIC would coordinate the interoperability framework of regulations, license requirements, grant conditions, and technical standards with other entities (e.g., the Public Safety Broadband Licensee [Public Safety Spectrum Trust], DHS, NTIA and NIST). *The FCC has established an ERIC Technical Advisory Committee (TAC) and a Public Safety Advisory Committee (PSAC) to serve a central advisory role to ERIC and has been organized under the Federal Advisory Committee Act (FACA).*

Waivers and Leases

May 12, 2010 – The FCC issued conditional waivers to 21 of the early Waiver Petitioners

States (8) – Alabama, Hawaii, Iowa, Mississippi, New Jersey, New Mexico, New York, Oregon

Counties/Regions (5) - Adams County-Denver Airport (CO), Bay Area (CA), Mesa-TOPAZ (AZ), San Antonio (TX), Wisconsin Counties (WI)

Cities (8) - Boston (MA), Charlotte (NC), Chesapeake (VA), Washington (DC), Los Angeles (CA), New York City (NY), Pembroke Pines (FL), Seattle (WA)

September 9, 2010 – The FCC approved 20 PSST Spectrum Leases for those entities listed above with the exception of Alabama, which was not ready to move forward

December 2009 – December 2010 – 50 petitions have been filed requesting Waivers for local/regional/state build-out using the 700 MHz Public Safety spectrum licensed to the PSST. In addition to the original 20 waivers there are thirty additional waiver applications including 8 states, 18 counties/regions, and 4 cities.

A DIFFERENT FUNDING MODEL IS ESSENTIAL

Federal Funds to build, manage and refresh a nationwide network must be based on a new and unified funding approach as opposed to a grant program to selected localities such as the BTOP Program.

Broadband Technology Opportunities Program (BTOP) Public Safety Grants

City of Charlotte (NC)	$ 16.7M
State of New Mexico (NM)	$ 38.7M
Bay Area [Motorola] (CA)	$ 50.0M
State of Mississippi (MS)	$ 70.0M
State of New Jersey (NJ)	$ 39.6M
Los Angeles RICS (CA)	$154.6M
Adams County (CO)	$ 12.1M

Network Management

- The recurring costs to manage and refresh a network, over the long term, will be the largest cost component regardless of configuration.
- A single operator Network, being a more simple configuration, will cost the least amount to manage, maintain, upgrade, etc.
- An example of this would be the cost of a Network Operations Center (NOC). Having multiple operators will require multiple NOCs – one for each operator at a minimum, while a single operator will only need two (for redundancy and perhaps more for operational considerations).
- Release upgrades in a network of networks would need to be coordinated and funding among all the network operators to keep every LTE component at the same release level. This would slow the overall evolution of the national network to match the slowest of the multiple network operators or if uncoordinated upgrades are made the features available will not be uniform across the nation and could cause operability and interoperability problems.

Priority on the network

- Must not forget that local officials are concerned about priority access and Quality of Service (QOS)
- With multiple operators there would need to be many plans developed and maintained
- A process (or multiple processes if multiple operators) to manage priority levels for local incident management will need to be developed
- This process does not depend on the number of operators to meet local needs
- The greater the number of operators the more this will look like the LMR systems and obstacles to interoperability like we have in the LMR environment today

Conclusion

We urge the FCC to work with the PSBL/PSST and the public safety community to develop a practical plan based upon the reality of day to day/year to year management and refreshment of the network and that is based on a funding plan that departs from the past system of grants that are often reflective of political influences rather than achieving the goal of a nationwide interoperable network.