



INTERNATIONAL ASSOCIATION OF FIRE CHIEFS

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November 1, 2017

The Honorable Marsha Blackburn
Chairman
Committee on Energy and Commerce
Communications and Technology
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Michael F. Doyle
Ranking Member
Committee on Energy and Commerce
Subcommittee on Communications and Technology
U.S. House of Representatives
Washington, D.C. 20515

Dear Chairman Blackburn and Ranking member Doyle:

On behalf of the nearly 12,000 members of the International Association of Fire Chiefs (IAFC), this letter provides the views of the IAFC on the First Responder Network Authority (FirstNet). I thank the subcommittee for this opportunity to provide a public safety perspective on the need for a nationwide public safety network and to examine the real progress that FirstNet has made.

The Middle-Class Tax Relief and Job Creation Act of 2012 (P.L. 112-96) established FirstNet as an independent authority within the U.S. Department of Commerce's National Telecommunications and Information Administration. Under the act, FirstNet is tasked with building, deploying, and operating a self-funding, sustainable, interoperable broadband network for public safety entities across the country and within U.S. territories.

FirstNet's goal of building the nationwide public safety broadband network to meet the needs of first responders is a matter of critical importance for public safety. While the task will not be easy, the IAFC believes that FirstNet has developed the leadership, staff, and support from states, public safety, and other key stakeholders required to make this network a reality for first responders and the public who call on them for help in their time of need.

As a veteran fire chief, and as a firefighter who has responded to numerous incidents, I know firsthand the benefits that the FirstNet broadband network stands to offer in terms of improving communications, coordination, and situational awareness during public safety operations. Just as smartphones have changed our personal lives, FirstNet devices and applications ultimately will change the way public safety operates. The ability for a single broadband communications network to be used to dispatch Emergency Medical Services (EMS) personnel, a medical helicopter, fire personnel, and other emergency responders from different jurisdictions all at the same time, while enabling video, text, and data communications at broadband speeds will save critical minutes when it matters most.

As circumstances and technology continue to make our world smaller, situational awareness, real-time information, and data are critical to the safety of America's fire and emergency service and the public we are sworn to protect. In terms of daily operations, America's firefighters deal with an increasingly complex environment that requires ever-increasing amounts of information and data to keep citizens and themselves safe. The FirstNet network will make it possible to gain quick access to new tools and applications that provide location data and other vital information for firefighting. It will enable the

exchange of real-time data and audio/video feeds on the fire ground to assist incident commanders with operational decision-making and maximize search and rescue and fire suppression effectiveness.

The FirstNet broadband network will make a profound change in how EMS is practiced. In the field of EMS, it is important to arrive at the critical-condition patient's location and transport him or her to emergency care at the hospital within minutes. The FirstNet network will facilitate critical decision-making in real time in the field, which in turn will help save lives.

Lessons learned from many events throughout the nation tell us that under emergency conditions, the nation's cellular carrier networks have quickly become overwhelmed and unusable for transmission of emergency data. The full development of FirstNet's nationwide public safety broadband network will ensure that America's first responders can access vital information under all emergency conditions.

Under the leadership of Chairwoman Sue Swenson, FirstNet is engaged with public safety daily and has sought input from the Public Safety Advisory Committee (PSAC). The PSAC is a 43-member committee established by the law creating FirstNet to provide significant recommendations and advice to FirstNet on mission-critical issues. The PSAC meets several times a year and is assigned projects on the public safety needs for the broadband network.

We believe FirstNet has worked hard to create opportunities for the public safety community to help shape the design of the network in the states and territories. For instance, FirstNet Board members, including Chair Swenson and executive-level staff, have traveled throughout the country reaching out and connecting with local and state public safety officials.

As you are aware, FirstNet awarded the contract to AT&T in March of this year after conducting a competitive process. At this point in time, 27 states and territories have opted-in to the network. No states have opted-out and decided to build their own radio access network (RAN) core which must be interoperable with the FirstNet network. Governors have until December 28 to decide to opt-in, opt-out or make no decision, which effectively means to opt-in.

The IAFC Board of Directors has adopted position statements supporting the nationwide broadband network, and recommending the states opt-in to the network. On June 11, the IAFC sent letters to the 56 governors of all states and territories urging them to opt-in to the network. The IAFC believes that if governors allow FirstNet to build out the RAN in their states, these decisions will result in the rapid delivery of services for the public safety community and financial stability for the states and their taxpayers. An 'opt in' decision by a governor is a low-risk option for the state, as FirstNet and its network partner will take on the financial, implementation and customer service responsibilities, as well as the maintenance and operation of the network over the next 25 years.

In addition, opting in to FirstNet will result in the nationwide broadband network being built out in a much shorter timeframe. Once a governor decides to opt in and allow FirstNet to build out the network, AT&T has stated it will provide immediate priority access to its existing network for emergency responders. This will accelerate the buildout of the network in the state and nationwide, and provide public safety with their much-needed broadband network.

If a governor decides to opt out and have the state build its own RAN, this will undoubtedly delay the delivery of service to public safety in the state or territory. There have been estimates that this could

cause a delay of service of up to two years. States will assume all technical, operational, political, and financial risks and responsibilities related to building their own RAN. In short, the state will need to ensure the interoperability of its RAN with the nationwide FirstNet network and take on the duties for ensuring its mission critical operations for the next 25 years.

Public safety fought hard to establish FirstNet because we knew that we were being left behind compared to the technologies available for personal-use communications. The IAFC is united with other national public safety organizations behind the desire to see FirstNet succeed and we will continue to fight for public safety's access to the best available technology to keep the public safe.

Currently, while FirstNet is focused on building a network for data communications, public safety agencies still must depend on land mobile radio (LMR). The FirstNet broadband network will be very beneficial for mission-critical video and data operations use for public safety. However, it is not ready to support mission-critical voice systems. Section 6103 of P.L 112-96 calls for the auctioning of the so-called T-Band spectrum (470 MHz-512 MHz) to begin by early 2021 and clearing current public safety operations from the band within two years of the end of the auction. This spectrum is essential to public safety.

This spectrum is utilized in 11 heavily populated metropolitan areas to support critical public safety communications and provide regional interoperability among first responders. These areas are:

- Boston
- Chicago
- Dallas
- Houston
- Los Angeles
- Miami
- New York
- Philadelphia
- Pittsburgh
- San Francisco
- Washington, DC

For example, New York City heavily relies on T-Band for operations and interoperability. Approximately half of the 132 volunteer Fire/EMS agencies in Suffolk County operate in the T-band, making the mandate particularly egregious. In the aftermath of the Boston bombing, much of public safety communications operated on the T-Band. T-Band has been used in the Boston area for 40 years allowing for interoperability which previously did not exist.

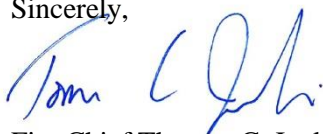
The National Public Safety Telecommunications Council (March 2013 report; updated May 2016) estimates that it will cost at least \$5.9 billion to migrate these jurisdictions' communications systems to another band. At least five jurisdictions do not have sufficient alternative spectrum to which to migrate. Mission-critical voice on the FirstNet broadband network may not be comparable to that on current LMR systems for possibly 10 years or more. Even if public safety was removed from the T-Band, the spectrum would still be heavily encumbered with business and industrial users. This would most likely result in any auction being a failure. There have been at least fifteen years of planning and grant funding since September 11, 2001, used in developing interoperability plans and common channel plans using the T-Band spectrum. This was evident in the Boston terrorist bombings for which T-Band interoperability, common channel plans, and hardened infrastructure proved successful in supporting public safety throughout the region.

The Final Report of the National Commission on Terrorist Attacks Upon the United States (9/11 Commission Report) identified the need for improved interoperable communications between first responders and recommended dedicated spectrum for public safety. These needs were again amplified and identified in the after-action reports of Hurricane Katrina and other incidents. The IAFC knows firsthand the benefits that mission-critical interoperable communications provide. While the FirstNet network stands to improve communications, coordination and situational awareness during emergency response operations, it will not – for the foreseeable future – replace mission-critical voice communications. It is for these reasons that the IAFC supports the repeal of section 6103 of P.L. 112-96 to allow public safety to continue using the T-Band spectrum to accomplish its mission.

While we realize there is still a lot of work to be done and FirstNet must continue to move quickly in building out the nationwide broadband network, the FirstNet network is urgently needed to increase the safety and capabilities of all public safety personnel and protect the American people. It is not only FirstNet which bears the responsibility for success, but it also falls on all public safety agencies to ensure success in the creation and administration of the broadband network. I feel confident that FirstNet is on the right path toward building a broadband network that will serve the nation's firefighters, EMS providers, and other emergency responders.

Thank you for the opportunity to provide our perspectives on the issues. If you have any questions, please contact Mr. Jim Goldstein, Manager of Government Relations, jgoldstein@iafc.org, 202-494-6607.

Sincerely,



Fire Chief Thomas C. Jenkins V
President and Chairman of the Board

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