International Association of Fire Chiefs
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September 27, 2019

The Honorable Mike Doyle.
Chairman.
Committee on Energy and Commerce.
Subcommittee on Communications.
and Technology.
306 Cannon House Office Building
Washington, D.C. 20151

The Honorable Bob Latta
Ranking Member
Committee on Energy and Commerce
Subcommittee on Communications
and Technology
2467 Rayburn House Office Building
Washington, D.C. 20151

Dear Chairman Doyle and Ranking Member Latta:

Thank you for the opportunity to submit a statement for the record for today's hearing on legislating to secure America's wireless future on behalf of the International Association of Fire Chiefs.

Communications are an integral part of emergency response. For decades, land-mobile radio communications have enabled responders to speak to one another in extreme conditions like fires, hurricanes, and other natural disasters. Radio remains a central part of the public safety communications ecosystem, which has recently grown to include broadband, data, 5G and the Internet of Things (IoT).

New communications technologies hold tremendous potential for public safety. Data from IoT devices, whether coming from a smartwatch, drone, or device on a firefighter's gear, will enable us to respond smarter, faster, and more safely. We have experienced instances of smart watches detecting falls and contacting 911. Sensors on drones help us detect hot spots, enabling us to predict the path of a wildland fire. According to the National Public Safety Telecommunications Council, "with analytics, IoT data and capabilities can be combined, filtered, and analyzed to provide 'actionable intelligence' for the first responder."[1]

The First Responder Network Authority (FirstNet) is conducting important work to enable true priority and preemption for public safety wireless communications through the buildout of a national broadband network. This buildout is anticipated to be completed between 2022 and 2023 and will ensure secure and reliable network access on scene. Greater network reliability and the arrival of 5G will support telehealth initiatives, connecting EMS patients and rural communities to doctors faster. In almost every arena

[1] National Public Safety Telecommunications Council, "Public Safety Internet of Things (IoT) Use Case Report and Assessment Attributes," June 2019, Page 1.

of emergency response, connectivity and data offer exciting opportunities to improve the safety of citizens and first responders.

With the emergence of new communications capabilities come new challenges in spectrum management. The fire and emergency service uses spectrum for mission-critical communications. As Congress and the FCC push for more efficient spectrum usage, we believe it is important that mission-critical communications are protected. For example, public safety uses point-to-point microwave links in the 6 GHz band that are highly sensitive to interference and require 99.999% or 99.9999% reliability. As the FCC considers allowing unlicensed devices in the 6 GHz band in its proposed rulemaking, we strongly advocate for rigorous, government-run testing of sharing technologies so that incumbent users are protected.

Another critical issue facing public safety is the pending auction of the T-Band spectrum. The T-Band, which sits between 470-512 MHz on the electromagnetic spectrum, supports radio communications in our nation's most populated metropolitan areas. Section 6103 of Public Law 112-96 directs the FCC to auction off the public safety spectrum by February 2021.

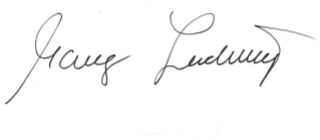
In June, the U.S. Government Accountability Office (GAO) released a report evaluating the challenges public safety would face if forced to move off the spectrum. The report concluded that it would cost close to $6 billion to move public safety users – a figure which did not account for infrastructure investments and the testing of new equipment. As a result of its findings, the GAO concluded, "Congress should consider legislation allowing public safety users continued use of the T-Band spectrum."[2]

Congressional action on the T-Band is imperative to protecting America's emergency preparedness. Of the eleven cities using the spectrum, New York City and Boston areas rely on the band for public safety communications interoperability and resilience. In the Houston area, industrial responders and refineries use the band to keep U.S. energy assets and neighboring communities safe. In Philadelphia, the spectrum helps keep local public safety agencies and the port connected. These are merely some of the major areas that face the threat of moving their public safety communications to alternate spectrum, which, depending on the region, is likely not available. We urge the Committee to act by marking up H.R. 451 Don't Break Up the T-Band Act, co-sponsored by Representatives Eliot Engel (D, NY-16) and Lee Zeldin (R, NY-1).

Public safety relies upon dependable spectrum resources to serve America's communities. As the Committee considers spectrum legislation, I urge you to consider ways to support the public safety communications ecosystem. This involves exploring rigorous testing of spectrum sharing solutions; encouraging communications interoperability and security; supporting investment in 911 infrastructure; and providing research funds to explore the uses of communications technology in the fire and emergency services. Thank you for the opportunity to comment in this matter.

[2] U.S. Government Accountability Office, "Emergency Communications: Required Auction of Public Safety Spectrum Could Harm First Responder Capabilities," June 2019.

Sincerely,



Fire Chief Gary Ludwig, EMT-P
President and Chairman of the Board

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