**Before the**

**Federal Communications Commission**

**Washington, DC 20554**

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| In the Matter of:  Boulder Regional Emergency Telephone Service Authority Petitions | )  )  )  )  )  )  )  ) | PS Docket 19-254 |

**COMMENTS OF**

**Ryan Poltermann**

While the *Spectrum Act* establishes a nationwide service, both the *Recommended Minimum Technical Requirements to Ensure Nationwide Interoperability for the Nationwide Public Safety Broadband Network* and the express designs of the *Spectrum Act* facilitate carrier interoperability. To quote the *Recommended Minimum Requirements*, Section 4.5.3 entitled “Roaming from NPSBN onto Commercial Mobile Networks” (emphasis added):

“**Sections 6206 and 6211 of the Spectrum Act clearly identify roaming to commercial networks as a key capability required in the NPSBN.** It will be especially important during the initial phases of deployment when Band 14 coverage is not yet ubiquitous.”

Both sections of the *Spectrum Act* are explicit in their intention. Here is Section 6206, for reference (emphasis added):

“(5) ROAMING AGREEMENTS.—The First Responder Network Authority shall negotiate and enter into, as it determines appropriate, roaming agreements with commercial network providers to allow the nationwide public safety broadband network to ***roam onto commercial networks and gain prioritization of public safety communications over such networks in times of an emergency***.”

Section 6211, Public Safety Roaming and Priority Access, is quoted in its entirety (emphasis added):

"The Commission may adopt rules, **if necessary in the public interest, to improve the ability of public safety networks to roam onto commercial networks and to gain priority access to commercial networks in an emergency** if— (1) the public safety entity equipment is technically compatible with the commercial network; (2) the commercial network is reasonably compensated; and (3) such access does not preempt or otherwise terminate or degrade all existing voice conversations or data sessions."

Interoperability falls squarely within public interest, particularly in disaster scenarios. It was also the expectation that FirstNet would use the Recommended Minimum Technical Requirements to design the NPSBN structure (emphasis added):

“The report of the Interoperability Board specifies the “Minimum Technical Requirements” necessary to achieve a national interoperable broadband network for our nation‘s first responders. **As specified in the Spectrum Act, FirstNet will use these recommendations to help develop and maintain the NPSBN,** a goal which can only be met with through extensive and on-going cooperation among States and communities.”

Secure access to alternative networks is a challenge but not impossible, and this was expressly considered by the Technical Advisory Board (see *Technical Requirements* Section 4.8.5). Other nations face the same issue and are moving forward with solutions: South Korea will use two carriers for their nationwide network and indications are that Canada will use multiple carriers as well for their everyday operations. Hurricanes, tornadoes, and wildfires do not have an interest in who owns which sites, and first responders in the United States deserve the ability to communicate in disasters.

Submitted Respectfully,

Ryan Poltermann