

**PUBLIC SAFETY AND HOMELAND SECURITY BUREAU SEEKS COMMENT ON RESPONSE EFFORTS
UNDERTAKEN DURING 2017 HURRICANE SEASON**

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Introduction

I am a trainer for Public Safety communications. I don't have a team of lawyers making sure that everything I write is politically correct, but I do have an opinion as an amateur radio operator, who has been licensed for thirty plus years, but also as a citizen. During most of my time as a licensee, I have dealt with public safety emergency communications in one form or fashion, and I can say without a shadow of a doubt that amateur radio operators (if properly trained) can be one of the best backup communications resource to a town, county, state or Federal entity. Amateur radio is not and should not be the priority, but like a good insurance policy, its there if you need it when everything else is essentially unusable.....like in Puerto Rico. With that said, I would like to respond only to the amateur radio question that was posed by the FCC:

"To what extent were response efforts facilitated by amateur radio operators? Going forward, should efforts be made to increase the use of amateur radio services in connection with the planning, testing and provision of emergency response and recovery communications?"

Discussion

Amateur radio operators have been assisting Public Safety since the sinking of the Titanic and have been used during every major disaster since that time. We have seen the use of these dedicated volunteers during earthquakes, floods and most recently during all three hurricanes that affected Puerto Rico, Texas and Florida. During their activation they passed weather updates, damage reports, message traffic for not only Public Safety personnel but for just the average citizen that wanted to let their families know that they were okay back on the mainland.

More and more, states have slowly began to realize exactly what this group of people can do for them and since the cost is free it really is hard to beat the price tag. States such as Illinois, Michigan, Colorado, North Carolina and Texas have expanded their training for the amateurs, above and beyond the normal ARES/RACES training, just so they can be a part of the Public Safety team. Although we have states putting amateur radio operators in their Emergency Operation Centers, most states still do not see the communication capabilities these people bring to the table.

For amateur radio to be really part of the Public Safety "brotherhood", the old days of emergency communications for amateurs must be updated. They must prove that their training and standards are just as tough and comprehensive as the people they expect to work with. The days of just relying on the training by the Amateur Radio Relay League (ARRL) is no longer sufficient to meet the high technology requirements and standards of the customer (public safety) they want to support. The ARRL is great with other parts of the amateur radio hobby such as promoting youth in radio, contests, newsletters and of course their magazine "QST". What they are not good at is the type of emergency communications that public safety expects. They don't have the subject matter experts, resources or the inclination to keep

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up with the requirements of the stakeholders they want to support. They sent out the "Force of Fifty", which really was only about 22 personnel. These people had never trained together, deployed together, had and no communications plan upon arrival at the site. I applaud this group of people for providing an emergency communications service until other communicators could show up, but a deployment of that type should never happen again until adequate training can be provided to those that go. We are still waiting to see the after-action report from the ARRL on that event. I guess the ARRL hasn't finished sanitizing the answers from the people who deployed.

Getting back to the question at hand *"Going forward, should efforts be made to increase the use of amateur radio services in connection with the planning, testing and provision of emergency response and recovery communications?"* My answer would be that with the appropriate training, by appropriate subject matter experts, yes.....amateur radio can be one of the most important tools in the tool box. A third party, outside of the ARRL, needs to survey the public safety community to find out exactly what is needed when they call up the various amateur radio groups. Then a national training plan, with specific standards, needs to be developed to meet those needs. Only by using a third party, outside of the ARRL and its sub-groups, can an honest evaluation be given to what the stakeholders needs. Then those stakeholders, led by the third party, needs to sit down with the various EMCOMM amateur radio groups to begin the development of specific training to meet those needs. Without this unbiased third party taking the lead, there will be no advancement of emergency communications training for the amateur radio community. It will remain the status quo. One such third party could be the DHS/Office of Emergency Communications, who already works side by side the with the states and the public safety community. It has trained thousands of amateur radio operators, with NIMS/ICS training, using their Auxiliary Communications (AUXCOMM) Program with "boots on the ground" subject matter experts with decades of experience. This is just one of many things they do regarding emergency communications for the country.

Summary/Recommendation:

The use of amateur radio operators as temporary backup emergency communications has not yet hit its stride. They will never replace professional Communications Leaders (COMLs), Communications Technicians (COMT), but they can be great for building a temporary bridge of communications until the professionals can come in and repair what has been broken. As with Puerto Rico, for the first few days all the Territory had for communications was the amateur radio operators and they were appreciative to have that. The Puerto Rican amateurs and the Force of 22 should be applauded for what they did, but there are things that need to be improved upon making this special group of people even better. It is recommended that a outside organization, away from the ARRL, research and develop a methodology that can improve this valuable emergency response resource for the national good.

Respectfully,

Anonymous